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1 opinion? 93

2 A. That would be my expert opinion because

3 it's -- again, that major alteration was confined to

4 that one restroom.

5 Q. Okay. So there's some -- you have this

6 alteration test and then some kind of proximity test

7 that sort of cabins off the amount of 2010 regs you

8 have to meet? Or maybe -- maybe a better way to put it

9 is when you make an alteration to one particular

10 element of the facility, that element and all of its

11 subelements, --

12 A. Uh-huh.

13 Q. -- right, like a men's room and then

14 everything in the men's room, would have to come up to

15 the 2010 standards, but everything outside of that

16 element would not?

17 A. Correct.

18 Q. Okay. If you would, I would like to go

19 through this report with you and ask -- we've covered

20 what formed the basis of your opinions in this report,

21 and I believe your testimony has been your visual

22 inspection of the premises and your understanding of

23 ADA regulations; is that correct?

24 A. That's correct.

25 Q. Okay. And your testimony earlier was that

1 you had not reviewed any of the documents that Variety 94

2 had produced in discovery prior to or after submitting

3 this report, other than you glancing in the white

4 notebook at dinner last night; is that correct?

5 A. That's correct.

6 Q. Okay. So then that would mean -- sorry.

7 Strike that.

8 Okay. If you would turn to page 3 of the

9 report. In the second paragraph you say that "On

10 Thursday, August 8th, 2013, an ADA compliance

11 inspection was conducted by Chuck Childers acting as

12 expert for the plaintiff, accompanied by counsel and

13 representatives of the defendant at the properties."

14 Did I read that correctly?

15 A. Yes.

16 Q. Okay. So you mentioned that you had been

17 to the store since this occasion at least once, which

18 was yesterday?

19 A. Yes.

20 Q. Do you recall going to the store any other

21 occasions between this August 8th, 2013 visit, and your

22 January 30th, 2014 visit?

23 A. No, I do not.

24 Q. Okay. Where you say that you were

25 accompanied by counsel and representatives of the

1 defendant at the properties, this isn't entirely 95

2 accurate, in my opinion, Mr. Childers. I assume when

3 you say representatives of the defendant, you're

4 referring to me and to the store employee that

5 accompanied us around -- accompanied you around the

6 premises; is that correct?

7 A. Actually, I was referring to yourself.

8 Q. Okay. So just me?

9 A. Right.

10 Q. One representative?

11 A. Right.

12 Q. But the fact of the matter is, while I did

13 walk around with you for most of the store, when you

14 and Mr. Lane inspected the bathrooms, I did not go into

15 the bathrooms with you. Do you recall that?

16 A. I believe you did not go to the bathrooms,

17 yes.

18 Q. Okay. But for the remainder of the

19 inspection, other than when you and Mr. Lane wanted to

20 have a private conversation, I was -- I was there; --

21 A. Yes.

22 Q. -- is that accurate?

23 A. That would be accurate.

24 Q. Okay. All right. In the next paragraph,

25 you say that "The estimated cost to correct

1 noncompliant elements are provided where applicable. 96

2 In determining costs, reference is made to local

3 contractor pricing and does not include architectural

4 plans and permits." What do you mean by local

5 contractor pricing?

6 A. In other words, part of the -- one of the

7 factors that I use to determine is, you know, different

8 pricing is -- is local contractor pricing. I look for

9 local general contractors to try to get to a ballpark

10 on what it would take to remove this particular

11 barrier.

12 Q. Now, earlier in your deposition, you

13 mentioned this use of MS Means data --

14 A. Right. Construction data.

15 Q. Would that reflect the local contractor

16 pricing, or is that in addition to the local contractor

17 pricing?

18 A. I would say it would be in addition. It's

19 just another resource that I use.

20 Q. Okay. And so the amounts of money that

21 you list next to the modifications we're going to

22 discuss refer to the cost it would be from looking at

23 the local contractor pricing to make your suggested

24 modifications; is that correct?

25 A. That's correct.

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1 Q. Okay. Is there anything else that you
2 would reference in determining the costs associated
3 with each modification other than the local contractor
4 pricing and the MS Means data?
5 A. Also I would -- I would sometimes confer
6 with other experts.
7 Q. With this particular case, have you
8 conferred with any other experts?
9 A. In this particular case, I have not.
10 Q. If you turn the page to page 4 -- and
11 we're going to take this report one step at a time.
12 You say here under the section entitled "Interior Path
13 of Travel," there's a subpoint A, and you say that "The
14 checkout counter does not provide signage containing
15 the ISA, which is in violation of 7.3 subsection 3 of
16 the 1991 ADA accessibility standards," correct?
17 A. Correct.
18 Q. Under Section 216.11 of the 2010
19 standards, does it not state that signage is not
20 require -- not required when all counters in a retail
21 store comply with Section 904.3?
22 A. If they do comply, if they're all
23 accessible, then, yes, you don't -- it's not required.
24 Q. Okay. So in order to determine whether or
25 not they're all required, you'd have to measure the

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1 height of the counter; that's the technical requirement
2 under the ADA, is it not?
3 A. No. It's one of the measurements you
4 would use. It's also the width between the counters
5 and so forth.
6 Q. Okay. And your report doesn't include the
7 measurement of the height or the width, does it?
8 A. No, it does not.
9 Q. Okay. In Section B, you state that "The
10 women's clothing department -- in the women's clothing
11 department, the accessible route is reduced to less
12 than 36 inches wide, violating Sections 4.3.3 and
13 36.211 of the 1991 standards," correct?
14 A. That's correct.
15 Q. Now, under both the '91 -- well, no,
16 strike that.
17 Under the 2010 standards, it is
18 permissible to have your route reduced to less than 36
19 inches, is it not?
20 A. For a two-foot period -- for a two-foot
21 distance --
22 Q. Correct. It can reduced to 30 --
23 A. -- to 20 --
24 Q. -- 32 --
25 A. -- to 24 inches.

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1 Q. I apologize. So for a two-foot distance,
2 it can be --
3 A. I'm sorry. I'm sorry. Right, 32 inches.
4 Q. Okay. So let's back up so she doesn't
5 kill us.
6 A. Right.
7 Q. I want to go home today.
8 A. For a two-foot length, 32 inches.
9 Q. Okay. Are there any other requirements
10 related to the reduction?
11 A. Not -- not that -- not that I can
12 remember.
13 Q. Now, when you visited this Roses for this
14 inspection, did you also inspect the men's clothing
15 department and the children's clothing department?
16 A. I believe I -- I walked around the store.
17 Q. Well, I appreciate that, but my question
18 was did you --
19 A. And I believe -- I believe --
20 Q. Let me finish my question. Just --
21 A. Yes.
22 Q. Okay. All right. So my question was did
23 you inspect the men's clothing department and the
24 children's clothing department?
25 A. Yes.

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1 Q. Okay. Your report, though, -- and if you
2 need a second to flip through -- it does not reflect
3 that you found any violations with respect to those
4 sections?
5 A. That is correct. I did not point out
6 every particular aisle and every particular instance of
7 where this particular thing occurred. It was more of a
8 sampling, if you will, of what this particular
9 violation looks like and examples of that.
10 Q. Okay. But this -- in your report, you
11 refer specifically to the women's clothing department,
12 do you not?
13 A. As a -- as a definition of where these
14 pictures were taken.
15 Q. Okay.
16 A. As a location --
17 Q. Right.
18 A. -- descriptor, if you will.
19 Q. Okay. And there is no specific reference
20 to either the men's clothing department or the
21 children's clothing department in this report, is
22 there?
23 A. That is true.
24 Q. Okay. Now, the complaint here is that --
25 and I'm looking, you know, for instance, in the --

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<p>1 there are -- there are six pictures under Section B. 2 I'm looking at the first one at the top left corner, 3 and what I see, what -- what looks like what I'll call 4 round racks of clothes. Do you see that? 5 A. Yes. 6 Q. The one on the left looks like it's a 7 2-for-10 deal, and the one on the right is the same; 8 it's just called 5 bucks, right? 9 A. Right. 10 Q. So do I understand that your opinion is 11 that there's not an accessible route of 36 inches in 12 between these round racks? 13 A. That is correct. 14 Q. Okay. Now, the recommendation -- and -- 15 and -- strike that. 16 And what you said earlier was this was 17 just a sampling. Do you believe that this problem, 18 this route of less than 36 inches, actually exists 19 between all the round racks in the women's clothing 20 department? 21 A. I wouldn't know. 22 Q. You wouldn't know. Because it's not in 23 your report; is that correct? 24 A. That's correct. 25 Q. And you are not able to recall, as you sit</p>	<p>101</p>	<p>1 Q. -- you have a section that's called "ADA 2 Standards Cited Within This Report"; is that correct? 3 A. That's correct. 4 Q. It appears to me that these sections that 5 you've included as a part of your report -- I take it 6 back. Strike that. 7 And so is the section that you're -- do 8 you see Section 403.5.1. as a part of this report? 9 A. I'm sorry. Say again. 10 Q. Sure. You reference 403.5.1. 11 A. Okay. 12 Q. And I see on page 18 -- this isn't a trick 13 question. I -- 14 A. Uh-huh. 15 Q. -- I'm just trying to make sure I got it 16 right. I see where Section 36.403 is included. 17 A. Uh-huh. 18 Q. But do you see Section 403.5.1 included as 19 a part of your report? 20 A. Okay. No. The -- the 2010 standards are 21 not cited in this report. 22 Q. Okay. So if you go back to page 5 -- is 23 that correct? 24 A. Yes. I don't know. 25 Q. In the recommendations -- sorry -- page 4.</p>	<p>103</p>
<p>1 here today? 2 A. That is correct, although -- 3 Q. And you -- 4 A. -- in this -- in your first picture that 5 we referred to, there is a measurement of that, which 6 is in the next picture. 7 Q. Correct. And it appears -- 8 A. Correct. 9 Q. -- to be 32 inches? 10 A. I can't -- I can't -- I can't read it. 11 Q. I -- it's difficult as well. This is the 12 report that I received from -- 13 A. Okay. 14 Q. -- from Mr. Lane, so. 15 A. I'd have to blow it up to see what it is. 16 I really -- 17 Q. Now, your recommendation with respect to 18 the women's clothing department is to relocate the 19 merchandise and to create a policy to maintain the 20 accessible features of the facility as required in 21 Sections 4.03.5.1 and 36.211; is that correct? 22 A. Yes. 23 Q. Okay. If you'd flip to the -- let's see 24 here. If you'd flip to page 15 of your report, -- 25 A. Okay.</p>	<p>102</p>	<p>1 A. Okay. 2 Q. In the recommendations, you cite the 3 Section 403.5.1 of the 2010 ADA standards, do you not? 4 A. Yes. 5 Q. Okay. So what you've done is you've only 6 included the 1991 standards. Your report actually 7 doesn't include the 2010 standards for reference; is 8 that right? 9 A. That's correct. 10 Q. Okay. 403.5.1, as I understand it, is the 11 section we were just talking about that requires that 12 there be an accessible route of travel that is 36 13 inches; is that correct? 14 A. I don't have my book in front of me, so -- 15 Q. Okay. So you don't know off the top of 16 your head? 17 A. I don't -- I -- 18 Q. That's fine. I -- listen, I'm not -- 19 A. Right. 20 Q. -- this ain't a memory test. 21 A. I haven't memorized all the -- all the 22 different numbers and just -- 23 Q. All right. When I look at the 2010 ADA 24 standards, what 403.5.1 says, in my book, is "Clear 25 width. Except as provided in 403.5.2 and 403.5.3, the</p>	<p>104</p>

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<p>1 clear width of walking services shall be 36 inches 2 minimum." Does that sound accurate, -- 3 A. It does sound -- 4 Q. -- to the best of your recollection? 5 A. It does sound accurate. 6 Q. Okay. All right. And then it has this 7 exception that we talked about where "The clear width 8 shall be permitted to be reduced to 32 inches, minimum, 9 for a length of 24 inches, maximum" -- and this is the 10 part you left off, which is that -- "provided that the 11 reduced width segments are separated by segments that 12 are 48 inches long, minimum, and 36 inches wide, 13 minimum." Does that sound accurate? 14 A. Yes. 15 Q. Okay. So this report doesn't capture all 16 of the particular measurements that are listed in the 17 exception of 403.5.1, does it? 18 A. It does not depict those measurements; 19 that's correct. 20 Q. Okay. You say here to relocate the 21 merchandise in the women's clothing department. 22 Praytell, where -- where would you relocate that 23 merchandise? 24 A. It's not a matter of relocating the 25 merchandise. It's a matter of relocating the stands to</p>	<p>105</p>	<p>1 measurements, didn't you? 2 A. Yes. 3 Q. So you had the opportunity to take those 4 measurements if you had wanted to? 5 A. Of the entire store layout? 6 Q. Correct. 7 A. I guess I could have. 8 Q. Okay. From your -- 9 A. Or I could have probably requested a site 10 layout. 11 Q. You could have, right. 12 A. Correct. 13 Q. Okay. So from your visits in the store, 14 do you recall how there are -- do you recall seeing 15 blue tape on the floor to delineate main aisles of the 16 store? 17 A. For the main aisles, yes. 18 Q. Okay. If those main aisles are the 19 minimum that's allowed under the ADA, and the blue tape 20 defines the area around each of the departments, 21 hypothetically speaking, -- 22 A. Okay. 23 Q. -- okay? And in the women's department, 24 they have these round racks where there's not compliant 25 36 inches' width, regardless of whether it's 1991 or</p>	<p>107</p>
<p>1 create that 36-inch path. 2 Q. Okay. Now, you were just in the store a 3 couple hours ago, correct? 4 A. Yes. 5 Q. And you've been in the store, you said, on 6 three to four other occasions? 7 A. Right. 8 Q. You created this Rule 34 inspection report 9 where you went in and you took specific measurements? 10 A. Correct. 11 Q. You created an initial inspection report 12 from the first time you went and that -- that 13 checklist? 14 A. Yes. 15 Q. At any time, have you seen a store layout 16 for this particular store? 17 A. No, I have not. 18 Q. Okay. Can you tell me how many square 19 foot -- excuse me -- how many square feet are located 20 within the women's clothing department? 21 A. No. I was not provided with that 22 information. 23 Q. And -- and so you have not had a chance to 24 -- strike that. 25 You were in the store and you took</p>	<p>106</p>	<p>1 2010, -- 2 A. Uh-huh. 3 Q. -- okay? In that particular situation, 4 there is nowhere to relocate those particular round 5 racks. The only choice that Variety would have would 6 be to remove them, would it not? 7 MR. LANE: Objection. 8 A. I wouldn't know that. I mean, it -- 9 logically, it would seem to me, based on visual, what 10 I've -- what I observed, that they could redesign the 11 existing area with those round racks to where they 12 could create a 36-inch path. 13 Q. So you believe, based upon your visual 14 inspections, that it would be possible to redesign the 15 women's clothing department without a reduction in the 16 number of actual racks of merchandise that would be in 17 that department? 18 A. That's what I believe upon visual. 19 Q. Okay. And that's only upon your visual 20 because you just stated that you did not take any 21 measurements of the actual women's department on your 22 visit to this particular store; -- 23 A. That is correct. 24 Q. -- is that correct? 25 A. Yes.</p>	<p>108</p>

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<p>1 Q. Okay. Would the same be true for the 2 men's section? 3 A. The same would be true for the men's 4 section. 5 Q. And would the same be true for the 6 children's section? 7 A. I think in the children's section we're 8 not talking about round racks. We're talking about 9 physical aisles. We're -- 10 Q. Assuming, then -- okay. Assuming that all 11 three departments are the same -- let --for just this-- 12 A. Let's assume they're round racks; is that 13 what you're referring? 14 Q. Yeah. Well, let's assume -- I mean, let's 15 assume that they're round racks. Let's assume that 16 they're square racks or four-ways, and let's assume 17 that there is a finite amount of space in these 18 sections before you create ADA compliance issues 19 elsewhere. 20 A. Uh-huh. 21 Q. What you're saying is that without having 22 done any measurements, and only upon your visual 23 inspection of the store, the last of which was ten 24 minutes for the entire store, you -- your expert 25 opinion is they would be able to redesign those</p>	<p>109</p>	<p>1 Q. Sure. Okay. So the hypothetical is we're 2 going to lose some round racks, all right? 3 A. Maybe. 4 Q. No, no, no. For the purposes of this 5 hypothetical, -- 6 A. Okay. 7 Q. -- it's we're going to lose them, okay? 8 I'm not saying that that's the case. I'm just -- for 9 the -- for the purposes of you and I talking. I 10 understand you dispute that and I'm not -- 11 A. Okay. 12 Q. -- there's not a catch here. 13 A. All right. 14 Q. So we've looked at it. We've measured it. 15 We've measured the round racks. We've measured the 16 size of the clothes on the round racks. We've 17 contemplated the seasonal variations and the size of 18 the clothes on the round racks. Who knows what else is 19 in there. We came down to the determination that in 20 order for there to be a 36-inch path of travel in 21 between all of these racks of clothing, we are going to 22 have to remove a certain number of racks, okay? So my 23 question is how would you determine what modifications 24 to that section of the store are readily achievable 25 under the ADA?</p>	<p>111</p>
<p>1 sections of the store such that they would not lose any 2 round racks and be able to meet all the elements of the 3 Americans with Disabilities Act under Title 3? 4 A. I -- 5 MR. LANE: Objection. 6 A. I believe that there is a way of doing 7 that, yes. 8 Q. But that's only based upon your visual 9 inspection? 10 A. That is correct. 11 Q. If there was not a way to do it, okay -- 12 let's -- let's say that your visual inspection was 13 incorrect, -- 14 A. Uh-huh. 15 Q. -- and that the actual measurements of 16 that particular section would require Variety to remove 17 a percentage of those round racks, what would be 18 necessary to determine whether or not the modification 19 that would be required would constitute a readily 20 achievable modification underneath the statute? 21 A. That was a long question. 22 Q. Sure. I can rephrase it, if you'd like me 23 to. 24 A. Would you rephrase it and maybe break it 25 down?</p>	<p>110</p>	<p>1 A. The question on your hypothetical, with 2 these round racks, was it considered when you -- when 3 you said they have -- we definitely have to get rid of 4 some of them, was one of the items considered of maybe 5 doubling the round racks, thereby, not needing as many 6 of them, thereby, you know, having more space? Is that 7 considered in your hypothetical? 8 Q. So you're saying that one of the potential 9 modifications -- let's -- let's rephrase the question 10 that I have, okay? 11 If you came to Variety and you said, 12 "You're going to have to -- you can't keep the racks in 13 this configuration," and they said to you, "Well, 14 there's no other configuration we have with these racks 15 that would make a 36-inch path of travel," what 16 modifications would you suggest to them as fiscally 17 responsible modifications? 18 A. So the question is there is no -- it 19 doesn't exist on planet Earth that there's -- there is 20 no way of designing a different type rack or -- or that 21 existed, that different type of rack which would 22 accommodate that; is that -- 23 Q. Correct. 24 A. -- part of the question? Okay. So 25 there's no way possible, regardless of what you did,</p>	<p>112</p>

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<p>113</p> <p>1 okay, that -- in that particular case, okay, there are</p> <p>2 exceptions to where you can -- there are exceptions to</p> <p>3 where it does state in the regs that they are not --</p> <p>4 the facility is not required to lose merchandise space.</p> <p>5 Primarily, and it's been a long time, but as I remember</p> <p>6 that section, I think it was referring to -- I</p> <p>7 shouldn't even mention it because -- it's was referring</p> <p>8 to reach ranges. In other words, the reason why all</p> <p>9 merchandise is not mandated to be 54 inches and 48</p> <p>10 inches high and that you can have merchandise higher</p> <p>11 than that is because of that same reasoning that you're</p> <p>12 -- that you're stating now.</p> <p>13 Q. Okay.</p> <p>14 A. Okay. But I could be wrong on that</p> <p>15 recollection. Maybe it does apply to floor stuff.</p> <p>16 It's just been a long time since I visited that part of</p> <p>17 it.</p> <p>18 Q. Okay. So underneath the definition of</p> <p>19 what constitutes discrimination of the ADA, does it say</p> <p>20 anything about -- and I'm going to come back to what</p> <p>21 you just talked about, but I just want to make sure --</p> <p>22 make sure we're on the same page here. Does it say</p> <p>23 anything about what a defendant would have to do if</p> <p>24 there was not a readily achievable modification?</p> <p>25 A. No, he doesn't have to do anything. Under</p>	<p>115</p> <p>1 Q. Okay. And I say, "well, you know, my</p> <p>2 store only made \$100,000 last year and for me to go and</p> <p>3 replace all the racks in the women's department, you</p> <p>4 know, and I've got the same problem in the men's</p> <p>5 department, is going to be \$100,000." Is that a</p> <p>6 fiscally responsible modification?</p> <p>7 MR. LANE: Objection.</p> <p>8 A. Well, I would have suggested we don't need</p> <p>9 to remove all of your existing ones. We probably only</p> <p>10 need to buy a couple of the double-height ones just to</p> <p>11 give us the room for the 36 inch, and we're probably</p> <p>12 not looking at anywhere close to a \$100,000 for these</p> <p>13 type of racks. I really don't know what they cost, but</p> <p>14 I can't imagine that they would even approach that</p> <p>15 number.</p> <p>16 Q. So if a store -- and I understand this a</p> <p>17 hypothetical --</p> <p>18 A. And the other --</p> <p>19 Q. -- is not directly -- let me finish.</p> <p>20 A. Sure.</p> <p>21 Q. I understand this hypothetical is not</p> <p>22 directly applicable because we're talking about one</p> <p>23 store right now.</p> <p>24 A. Uh-huh.</p> <p>25 Q. But, you know, if a store only makes --</p>
<p>114</p> <p>1 -- under -- under 1991 barrier removal, no. If it's</p> <p>2 not readily achievable, he's not required. He's only</p> <p>3 required to remove barriers that are readily</p> <p>4 achievable.</p> <p>5 Q. All right. So you're my expert and I've</p> <p>6 said, "I've got this problem." And you say, "P.J.,</p> <p>7 there's no way to rearrange these racks." And you've</p> <p>8 asked me, "Are there any other racks you can buy?" And</p> <p>9 I say, "well, there are no other single-layer racks out</p> <p>10 there that would satisfy the problem I have, which is</p> <p>11 I'm going to lose merchandise space, you know, which is</p> <p>12 going to cause me to lose profit."</p> <p>13 A. Uh-huh.</p> <p>14 Q. One of the modifications that you</p> <p>15 suggested was for me, as the store owner, to look and</p> <p>16 see whether or not there would be double racks; is that</p> <p>17 right?</p> <p>18 A. Right.</p> <p>19 Q. So like two layers of clothing?</p> <p>20 A. Uh-huh.</p> <p>21 Q. And to your knowledge, there's no</p> <p>22 violation of the ADA in terms of having merchandise</p> <p>23 that's out of reach of someone that may be confined to</p> <p>24 a wheelchair; is that correct?</p> <p>25 A. That is correct.</p>	<p>116</p> <p>1 let's say my store -- well, take -- go back to Bob's</p> <p>2 Restaurant. It only makes a \$100,000 a year, okay?</p> <p>3 That's his total income before taxes, \$100,000. What</p> <p>4 opinion would you provide to Bob about which</p> <p>5 modifications are readily achievable under the ADA?</p> <p>6 MR. LANE: Objection.</p> <p>7 Q. Is there any kind of line, you know, a --</p> <p>8 A. It's the same as we discussed earlier.</p> <p>9 Readily achievable has the two prongs. One is</p> <p>10 financial ability to fix the problem, okay?</p> <p>11 Q. Right.</p> <p>12 A. If they don't have the financial ability</p> <p>13 to fix the problem, then they don't have to remove that</p> <p>14 particular barrier.</p> <p>15 Q. And how would you determine whether or not</p> <p>16 -- if I'm Bob's Restaurant, okay, whether I had -- and</p> <p>17 I make a \$100,000 a year before taxes as a business,</p> <p>18 how would you -- what would you tell me I can</p> <p>19 financially afford?</p> <p>20 A. It -- it's -- it's -- it's more than just</p> <p>21 looking at an income statement. You've got to look at</p> <p>22 the cash flow. You've got to do a cash flow analysis.</p> <p>23 You've got to look at the balance sheet, see what cash</p> <p>24 they have on hand to make that determination.</p> <p>25 Q. Going back to your report -- looking at</p>

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<p>1 page 4 again, -- 117</p> <p>2 A. Okay.</p> <p>3 Q. -- and I know it's kind of hard to see,</p> <p>4 but, I mean, I think if you look at the picture in the</p> <p>5 bottom left-hand corner, you've got what looks like the</p> <p>6 bottom of a rack, and it looks like that it's --</p> <p>7 there's no wheel on that rack, right?</p> <p>8 A. Okay. Are we talking about paragraph D?</p> <p>9 Q. No, we're still on -- on --</p> <p>10 A. Oh, on 4.</p> <p>11 Q. -- we're still on B on page 4.</p> <p>12 A. Oh, I'm sorry.</p> <p>13 Q. It's all right.</p> <p>14 A. All right.</p> <p>15 Q. Okay. And the picture in the bottom</p> <p>16 left-hand corner, you've got the measuring tape and</p> <p>17 what looks to be the base of one of these racks, and it</p> <p>18 doesn't appear that there's any kind of wheel or</p> <p>19 anything on the rack. Would you agree?</p> <p>20 A. I can't tell by the picture.</p> <p>21 Q. Okay. Well, let's -- let's assume that</p> <p>22 there's not.</p> <p>23 A. Okay. We'll assume that.</p> <p>24 Q. You know, would -- would one -- you said</p> <p>25 earlier that a part of what you do for both -- I mean,</p>	<p>119</p> <p>1 Q. And explain to me what the difference is.</p> <p>2 I mean, I know what the difference is between a</p> <p>3 temporary and a permanent solution, --</p> <p>4 A. Right.</p> <p>5 Q. -- but what -- what makes you consider</p> <p>6 this to be a temporary solution?</p> <p>7 A. No, I said -- I didn't say it would be. I</p> <p>8 just said it could be.</p> <p>9 Q. It could be.</p> <p>10 A. Right.</p> <p>11 Q. Okay. So then it could be a permanent</p> <p>12 solution as well?</p> <p>13 A. Just like an example also is -- and when I</p> <p>14 say temporary, I mean these fixes don't have to occur</p> <p>15 overnight. These fixes can be done, you know, over a</p> <p>16 period of years, --</p> <p>17 Q. Uh-huh.</p> <p>18 A. -- okay, with a -- with a proper plan in</p> <p>19 place to where, okay, we're doing it -- we're budgeting</p> <p>20 X amount of dollars this year to do this, X amount of</p> <p>21 dollars to do this this year. So in a period of three</p> <p>22 years, you're done. Budgeted out, it doesn't have to</p> <p>23 be overnight. It doesn't have to break the bank. It</p> <p>24 doesn't have to put you out of business.</p> <p>25 Q. Let's go back to our -- to the</p>
<p>118</p> <p>1 for defendants, I guess, for companies, is tell them</p> <p>2 what their options are?</p> <p>3 A. Yes.</p> <p>4 Q. In other words, that even while in this</p> <p>5 particular report, you -- you have recommendations,</p> <p>6 plural, you've really only got one recommendation</p> <p>7 relating to the actual placement of the merchandise,</p> <p>8 which is to relocate it. But, in fact, there may be</p> <p>9 other potential modifications that would meet the ADA</p> <p>10 standard, would there not?</p> <p>11 A. Yes.</p> <p>12 Q. So would one -- for instance, in this</p> <p>13 particular case, if -- if I as the store owner said,</p> <p>14 "You know what, Chuck, I don't want to deal with buying</p> <p>15 double racks and having to have employees up on ladders</p> <p>16 to try and fill merchandise; would it be possible for</p> <p>17 me to put my racks on wheels so that employees could</p> <p>18 assist customers to roll them out of the way," would</p> <p>19 that potentially be a modification that would satisfy</p> <p>20 the ADA?</p> <p>21 A. It would be a temporary solution. In</p> <p>22 other words, you can put signs in your store, "Please</p> <p>23 ask for assistance if you need assistance." It's what</p> <p>24 we would consider a temporary solution. It would not</p> <p>25 be what I would consider a permanent solution.</p>	<p>120</p> <p>1 hypothetical here. What we're talking about, though,</p> <p>2 is selling space reduction. And you've told me that</p> <p>3 under the ADA, though you didn't say for sure because</p> <p>4 you didn't want me to quote you on it because you</p> <p>5 didn't remember, but it was possible that as a retail</p> <p>6 store owner, I could avoid complying because the</p> <p>7 modification would result in a loss of selling space.</p> <p>8 Let's assume that's what it says here for a second.</p> <p>9 A. Okay.</p> <p>10 Q. And I say, "Chuck, you know, not only -- I</p> <p>11 mean, I'm glad to hear that there's this exception</p> <p>12 because if I lost" -- you know, let's say that I've got</p> <p>13 to remove 20 percent of my round racks and you've</p> <p>14 looked at my cash flow and my budgets and I could show</p> <p>15 you, look, you know, instead of making \$100,000 a year,</p> <p>16 I'm actually only going to make like 40,000 or 50,000</p> <p>17 bucks. It's going to take away 50 percent of my</p> <p>18 profitability, right?</p> <p>19 A. Uh-huh.</p> <p>20 Q. I can't -- I can't afford that. That's a</p> <p>21 substantial loss, wouldn't you agree?</p> <p>22 A. Yes. That would be -- in that particular</p> <p>23 example, it would be a substantial loss and basically</p> <p>24 an undue burden.</p> <p>25 Q. And so --</p>

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<p>1 A. That being said, in your same 2 hypothetical, I mean, I just can't imagine -- we're not 3 talking about double-tier racks that are ten feet high. 4 We're talking about what you see in Kmart, and maybe 5 even this store has it. I don't remember. But we're 6 talking about one -- one tier is at eye level and the 7 other tier -- and most of the time you see them in 8 kids' -- in kids' areas because the clothing is smaller 9 and so forth and you've got shirts and so forth. So it 10 seems to me that there should be some design, some way 11 of configuring this to where you could make everybody 12 happy and accommodate both worlds. 13 But in your example, if, for some chance 14 there was no way on the planet, okay, of making that 15 happen, then you're right, and if it was affecting your 16 cash flow that much, in my opinion, it would be an 17 undue burden. 18 Q. Okay. So my choices would be I can spend 19 the money and go buy some double racks and work to 20 create, you know, something that would comply with 21 403.5.1 and its exceptions, correct? 22 A. To create a more user-friendly 23 environment, yes. 24 Q. Okay. 25 A. And not really so much -- it's called</p>	<p>121 1 There could not be. I can't tell from this picture. 2 Q. Okay. Well, if that, in fact, was the 3 case, as we discussed about the exception to 403.5.1, 4 it's possible that the accessible route could be 5 reduced to less than 36 inches so long as that 6 particular space was no deeper than 24 inches; is that 7 correct? 8 A. That's correct. 9 Q. Okay. And it doesn't appear that you've 10 measured the depth of the ends of each of the aisles? 11 (CELL PHONE RINGING) 12 A. Sorry. Let me turn this off. 13 Q. That's okay. As I was saying, it doesn't 14 appear in your report that there's any measurement with 15 respect to the width of the racks that are in the 16 picture on the left; is that right? 17 A. No. There's not any actual measurements 18 there, but visually I was able to see that it was 19 greater than two feet. 20 Q. So if Variety -- assuming that there was a 21 violation, if Variety widened this particular aisle to 22 36 inches, then it would comply with Section 403.5.1 23 and 36.211 of the 2010 and ADA standards; is that 24 correct? 25 A. If they were to move it and if they were</p>
<p>1 universal design. Not so much -- I mean, in this case, 2 we are talking ADA, so we're talking about people with 3 disabilities. But also people, you may have noticed, 4 are gaining weight, maybe myself. It's easier to get 5 around in spaces that are -- that are, you know, at 6 least 36 inches wide. So I think it accommodates a lot 7 of people. 8 Q. Do you know why people shop at Roses? 9 A. I've never asked anybody why they did. 10 I've shopped at Roses. 11 Q. Okay. Okay. Let's go to Section C on 12 page 5. It seems to be a pretty -- I can't read the 13 measurement again in your report that was provided to 14 me, but you state that the accessible route is reduced 15 to less than 36 inches in the bedding department; is 16 that correct? 17 A. Yes. 18 Q. Now, if you look at the picture on the 19 left, you can see where the rows of the store appear to 20 end next to the bedding department. Would you agree 21 that I'm accurately describing that image? I mean, it 22 looks to me like there's one -- there's a couple of 23 aisles running to the left of the picture. Do you see 24 that? 25 A. I would be guessing. There could be.</p>	<p>122 1 to maintain it. In other words, not move it back or 2 put additional displays in the way, then that would be 3 correct. I mean, the most important thing with this is 4 about maintaining. Once you make it accessible, 5 maintain it. In other words, you know, keep it 6 accessible. So, as you know, things in stores move. 7 They just do. On their own sometimes, and they just 8 move. Employees move them from time to time, and so 9 you really have to be on top of maintaining the 10 accessibility of your particular facility. After all, 11 you spent the time and effort to make it accessible. 12 You know, part of the responsibility is to maintain the 13 accessibility. 14 Q. So in other words, looking at the 15 recommendation, if Variety were to relocate the 16 merchandise stands and to create a policy to maintain 17 the accessible features of the facility, then it would 18 satisfy Sections 403.5.1 and 36.211 of the 2010 19 standards? 20 A. If they created the policy and enforced 21 it, yes. 22 Q. Okay. But that's not listed in your 23 recommendations, is it? 24 A. Well, it's talking about -- well, creating 25 a policy -- 36.211 is in my recommendations. Oh -- oh,</p> <p>123 124</p>

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<p>1 I see what you're saying. Creating a policy, okay.</p> <p>2 Yes. To be more accurate, we should probably put "to</p> <p>3 enforce it." But creating a policy to maintain it,</p> <p>4 we're assuming that you're going to, once you create</p> <p>5 the policy, like you do with health and resource</p> <p>6 policies with employees, you enforce them.</p> <p>7 Q. Okay. In -- let's move to Section D. You</p> <p>8 say, "In the children's department, the accessible</p> <p>9 route is reduced to less than 36 inches." And what</p> <p>10 appears here to me is a ceiling support beam in the</p> <p>11 middle of the aisle.</p> <p>12 A. Uh-huh.</p> <p>13 Q. Now, you can't tell from this picture, but</p> <p>14 if the aisle is 60 inches wide and less than 50 feet</p> <p>15 long on either side of the pole, would there be a</p> <p>16 violation of the ADA with respect to the pole</p> <p>17 placement?</p> <p>18 A. Less than 50 feet wide? I don't</p> <p>19 understand.</p> <p>20 Q. Well, under the ADA, at least my reading</p> <p>21 of it, --</p> <p>22 A. Okay.</p> <p>23 Q. -- you've got to have turn-around points</p> <p>24 that are accessible to people in wheelchairs within a</p> <p>25 certain amount of feet.</p>	<p>125</p> <p>1 relocate the merchandise stands and satisfy 403 and</p> <p>2 36.211. If Variety moved these merchandise stands to</p> <p>3 either allow for 36 inches for a width of somewhere</p> <p>4 between 32 and 36 inches and maintained and enforced</p> <p>5 this policy you speak about, they would comply with</p> <p>6 Sections 403 and 36 of the 2010 standards, would they</p> <p>7 not?</p> <p>8 A. 403, yes.</p> <p>9 Q. Okay. And a part of the reason that you</p> <p>10 can say yes is because you can see by looking at the</p> <p>11 pole -- you don't have the measurement, but even I can</p> <p>12 visually inspect this pole and tell you it's not 24</p> <p>13 inches deep, right?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Okay. Is that a yes?</p> <p>16 A. Sorry. Yes.</p> <p>17 Q. All right. Let's go to Section E. You</p> <p>18 say that the spout of the water fountain is not at a</p> <p>19 required height, and I can't even see what the</p> <p>20 measurement is on your ruler here. What is the</p> <p>21 required height under Section 4.15.2?</p> <p>22 A. It's the same. It's 36 inches max from</p> <p>23 the finished floor.</p> <p>24 Q. To what?</p> <p>25 A. From the finished floor to the spout.</p> <p>127</p>
<p>1 A. Yes, a turning space.</p> <p>2 Q. It's like every hundred feet, I think, or</p> <p>3 200 feet?</p> <p>4 A. Right.</p> <p>5 Q. So I picked 50. Fifty is an arbitrary</p> <p>6 number less than a hundred.</p> <p>7 A. Right.</p> <p>8 Q. So what I'm -- what I'm asking is if Mr.</p> <p>9 Richardson had the ability, based upon there being 60</p> <p>10 inches of width in this picture, in this aisle, to turn</p> <p>11 around when he met the pole, go less than 50 feet to</p> <p>12 the end of an aisle and be able to access the other</p> <p>13 side of this pole by going around the aisle that you</p> <p>14 can see in the picture, would there be an ADA</p> <p>15 violation?</p> <p>16 A. No. He could actually -- he could</p> <p>17 actually go around. It kind of defeats the purpose of</p> <p>18 the continuous route because the ADA -- the ADA talks</p> <p>19 about having that continuous 36-inch -- a continuous</p> <p>20 accessible route, okay, which one of the definitions of</p> <p>21 an accessible route is 36 inches except for that</p> <p>22 exception for the two feet. So in that particular</p> <p>23 case, I do not think it would be compliant to allow</p> <p>24 this to remain the way it is.</p> <p>25 Q. Okay. So your recommendation here is to</p> <p>126</p>	<p>1 Q. To the spout. And is that where the water</p> <p>2 comes out, or is that the guard behind where the water</p> <p>3 comes out?</p> <p>4 A. No. That is the actual -- where the water</p> <p>5 comes out.</p> <p>6 Q. Where the water comes out, okay. All</p> <p>7 right. You say that as a recommendation, you wanted to</p> <p>8 provide a water fountain -- or you recommend Variety</p> <p>9 provide a water fountain with a spout outlet of 36</p> <p>10 inches above the finished floor -- maximum above the</p> <p>11 finished floor in compliance with 602.4 of the ADA</p> <p>12 standards; is that right?</p> <p>13 A. Yes.</p> <p>14 Q. So let's imagine that this spout measured</p> <p>15 36 and one-half inch, okay?</p> <p>16 A. Yes.</p> <p>17 Q. Are there other possible modifications</p> <p>18 that would cost less than \$500 to fix this one-half</p> <p>19 inch variable?</p> <p>20 A. Sure. They could lower -- they could</p> <p>21 lower the existing water fountain.</p> <p>22 Q. Well, no. That's what you're basically</p> <p>23 telling them to do.</p> <p>24 A. Right.</p> <p>25 Q. I mean, you're saying provide a water</p> <p>128</p>

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<p>1 fountain, but what you mean is lower the one that's 2 there. But let's say that lowering the one that's 3 there costs 500 bucks, okay? Hell, let's say it cost 4 250. Are there -- you know, you say in your resume 5 that you're interested in proposing fiscally 6 responsible solutions. So I say to you, "Chuck, this 7 thing is only half an inch high and you're telling me I 8 got to spend \$250 to move it half an inch. Are there 9 any other recommendations you can provide me?"</p> <p>10 A. Well, there are. At least there were. In 11 '91, there are certain tolerances. In this particular 12 case, I know you can't read it in the picture, but I 13 think it was 37 inches, so it was an inch off. My job 14 is to -- as I see it, is to identify the violations as 15 they exist, okay? What happens in the real world is 16 you would discuss with Chris and say, "You know, is 17 that" -- you're going back to your example of the half 18 inch -- "is that really so important?" And it's kind 19 of a give-and-take, is what I've seen in the past. And 20 some things are argued that it's not readily 21 achievable. Some things are argued that they are. And 22 some things are just settled. Okay, so what I try and 23 do is document everything that exists, and then what 24 happens after that, I really don't have a dog in that 25 fight, if you will. Let me also give you an</p>	<p>129</p>	<p>1 A. Nor have I ever seen one in any other 2 report.</p> <p>3 Q. All right.</p> <p>4 A. It's almost impossible.</p> <p>5 Q. I mean, you attach the 1991 standards and 6 then it -- you know, it lists that Variety could 7 install an accessible paper cup dispenser at an 8 existing water fountain on 36.304, which is on page 15 9 of your report, subsection 19. And my question is why 10 would you recommend that Variety -- or why would you 11 recommend to Mr. Lane that he ask Variety to spend \$500 12 to move a water fountain an inch when, in fact, under 13 the regulations, there's a much more fiscally 14 responsible modification, namely providing a paper cup 15 dispenser?</p> <p>16 MR. LANE: Objection.</p> <p>17 A. Like I said, there are many ways of 18 addressing a particular problem. I do not list every 19 potential possible remedy because there are probably 20 some that I haven't even thought of, and some that come 21 to mind and some that don't come to mind from time to 22 time.</p> <p>23 Q. Now, if Variety moved this water fountain, 24 would the water fountain comply with Section -- you 25 know, would it move it to where the spout outlet was 36</p>	<p>131</p>
<p>1 inexpensive way of fixing this problem. Provide a cup 2 dispenser right next to it.</p> <p>3 Q. Okay. All right. So, I mean, you said in 4 your C.V. that you want to provide fiscally responsible 5 solutions and that you want to make sure the ADA is 6 followed but at reasonable cost, correct?</p> <p>7 A. That's correct.</p> <p>8 Q. All right. And in this particular 9 instance, I understand you don't think you have a dog 10 in the fight, but your expert report provides 11 recommendations with each particular violation that you 12 found, does it not?</p> <p>13 A. It doesn't provide all the possible 14 recommendations, --</p> <p>15 Q. It doesn't?</p> <p>16 A. -- all the possibilities. There could be 17 dozens for any one particular problem.</p> <p>18 Q. So in no part of your report are all the 19 possible ADA-compliant modifications listed, are there?</p> <p>20 A. All the possibilities, no, not --</p> <p>21 Q. Let me finish.</p> <p>22 A. Go ahead.</p> <p>23 Q. All right. Are there?</p> <p>24 A. No.</p> <p>25 Q. Okay.</p>	<p>130</p>	<p>1 maximum above the finished floor? Would it -- would 2 Variety be in compliance with 602.4?</p> <p>3 A. If it moved it down to that measurement?</p> <p>4 Q. Yeah.</p> <p>5 A. More than likely.</p> <p>6 Q. So you can't say with certainty?</p> <p>7 A. I'm pretty sure that it would.</p> <p>8 Q. Does the 2010 ADA standards require there 9 to be two water fountains at two different heights?</p> <p>10 A. 2010?</p> <p>11 Q. Uh-huh.</p> <p>12 A. I don't remember.</p> <p>13 Q. Would you agree that if Variety moved this 14 water fountain, that would constitute an alteration to 15 the water fountain?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Let's look at Section F. You say 18 that the International Symbol of Accessibility is not 19 mounted on the latch side of the fitting room door and 20 that there's a stepping stool obstructing the approach; 21 is that right?</p> <p>22 A. There's a stepping stool obstructing the 23 maneuvering clearance.</p> <p>24 Q. Yeah. Just -- and this is something I've 25 had to work on to make sure I understand the ADA</p>	<p>132</p>

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<p>1 myself, but when it says that a sign must be mounted on 2 the latch side of the fitting room door, does that mean 3 on the physical door, on the side where the latch is, 4 or does it mean next to the door? 5 A. Actually, it specifically states the wall 6 next to the door. 7 Q. Okay. So with respect to these 8 violations, what Variety needs to do -- it appears that 9 there is an international symbol of accessibility but 10 it's, in fact, on the door. What they need to do is 11 move that to the right side of the door because that's 12 where the latch is; is that correct? 13 A. That's correct. 14 Q. And then with respect to the stepping 15 stool, this, again, gets into creating a policy and 16 enforcing it; would that be correct? 17 A. That's correct. 18 Q. All right. Looking at Section G, you say 19 that the umbrella protrudes more than four inches in 20 the path of travel and is mounted at 27 inches above 21 the finished floor. Looking at your measurement, it 22 appears to be that the umbrella is approximately 74 23 inches above the finished floor; would you agree? 24 A. Yes. 25 Q. Okay. All right. So this one --</p>	<p>133 1 Ms. McKimmon, who accompanied us around the store, 2 reaching up, and as I recall, that's when she couldn't 3 figure out how to turn off the alarm. Do you remember 4 that? 5 A. That is correct. 6 Q. All right. So she's trying to figure out 7 how to turn off the alarm to the door; is that right? 8 A. That's correct. 9 Q. And then the two controls that you're 10 referring to are pictured in the middle picture, which 11 are the latch ring, and then they had a sliding lock 12 mechanism on the door; is that right? 13 A. Right, on each of the door and they're 14 pictured -- 15 Q. Yeah. 16 A. -- here toward the center of the door. 17 Q. Correct. So you -- 18 A. Not where she's reaching. 19 Q. Right. So you can see on the first 20 picture that the -- you can see on the first picture 21 and the second picture that the latch ring is on the 22 left door and that then the sliding lock mechanism 23 locks the two doors together; is that correct? 24 A. Yes. 25 Q. Okay. And then you can see in the first</p>
<p>1 A. Whoa. Whoa. Whoa. Whoa. I'm not -- I 2 really can't read that measurement. I think it was -- 3 it was over 70, though. 4 Q. Okay. Well, it's over 70 inches. We'll 5 agree on that, all right? Okay? 6 A. Yes. 7 Q. Okay. All right. Would something that 8 protrudes 70 inches over the floor be an obstruction 9 for someone in a wheelchair? 10 A. No, not for somebody in a wheelchair. 11 Q. Let's go to -- 12 A. Only for basketball players. 13 Q. Manute Bol? 14 A. And possibly tall -- tall blind people. 15 Q. Let's go to Section H of the report on 16 page 7. 17 A. And by the way, that's what protruding 18 objects were -- that's why they're in there, is 19 basically for blind -- for blind people. 20 Q. Okay. 21 A. Okay. What page? 22 Q. Page 7, Section H, you say "The emergency 23 fire exit provides two controls mounted above the 24 prescribed reach ranges," and you've got a series of 25 three pictures. Now, with the first picture, it shows</p>	<p>134 1 picture that there is a single motion panic bar on one 2 of the exit doors; is that correct? 3 A. That's correct. 4 Q. Okay. Now, under the ADA, when you have a 5 double door emergency exit with a single motion bar on 6 one of the doors, do both the doors have to open, or 7 does one of only the doors have to open? 8 A. As long as -- as long as the door itself 9 is the correct width, -- 10 Q. Okay. 11 A. -- only one would be required. Of course, 12 you may violate a fire issue. I don't know. And 13 probably the way this was originally designed, the way 14 it's stood here on this particular day, it probably was 15 a fire issue. 16 Q. Okay. 17 A. In fact, I'm pretty sure it was because 18 even if you push this bar, the doors still did not open 19 without these -- these two things being pulled. 20 Q. Well, it looks to me it doesn't open -- we 21 know for sure it doesn't open because of the control 22 that latches the two doors together, -- 23 A. Yes. 24 Q. -- right? It's conceivable that the latch 25 ring on the left door is to open only the left door; is</p>
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<p>1 it not?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And your report does not provide</p> <p>4 any measurements as to the width of these two emergency</p> <p>5 exit doors, does it?</p> <p>6 A. No, it does not.</p> <p>7 Q. All right. Assuming that the width of</p> <p>8 these doors is satisfactory under the ADA, if Variety</p> <p>9 -- and assuming that the latch ring on the left door</p> <p>10 was only to open the left door -- if Variety removed</p> <p>11 that latch that appears in the second picture --</p> <p>12 A. The third picture, you mean.</p> <p>13 Q. No, The latch in the middle picture, the</p> <p>14 second picture.</p> <p>15 A. Okay.</p> <p>16 Q. Because that's the one that connects the</p> <p>17 two doors, right?</p> <p>18 A. Oh, this one, yes. Okay.</p> <p>19 Q. And then when you say "this one," you're</p> <p>20 pointing to the picture in the middle of the top of</p> <p>21 page 7?</p> <p>22 A. That's correct.</p> <p>23 Q. Right. Okay. If It removed that feature,</p> <p>24 then it would be in compliance with the sections you</p> <p>25 cite here in your report, wouldn't it?</p>	<p>137</p> <p>1 A. It does look to be similar, yes.</p> <p>2 Q. Okay. All right. So let's assume that</p> <p>3 that latch is just on the left door because I think it</p> <p>4 is just on the left door.</p> <p>5 A. Okay.</p> <p>6 Q. And let's assume that the panic bar is</p> <p>7 installed at the proper height and requires the proper</p> <p>8 force, nothing more, and the door was wide enough. If</p> <p>9 Variety removed that latch that connects -- the sliding</p> <p>10 latch that connects the two doors in the middle</p> <p>11 picture, the fire exit would be compliant, would it</p> <p>12 not?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 A. I don't even know why that latch was</p> <p>16 there.</p> <p>17 Q. I don't know why it was there either.</p> <p>18 A. It defeats the push bar.</p> <p>19 Q. Now, you cite here to Sections 225 and 811</p> <p>20 of the 2010 ADA standards.</p> <p>21 A. Okay.</p> <p>22 Q. When I look at the 2010 ADA standards,</p> <p>23 those relate to lockers and storage areas. Do you know</p> <p>24 why you cited to those with respect to the emergency</p> <p>25 exit doors?</p> <p>139</p>
<p>1 A. As long as -- what I don't understand is</p> <p>2 in this picture, I guess this is the right door?</p> <p>3 Q. All right. Let's back -- so you're</p> <p>4 pointing to the third picture on the right?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. It looks to me like that's the left</p> <p>7 door. It looks to me that the latch appearing in the</p> <p>8 picture on the far right is the same latch appearing in</p> <p>9 the picture in the middle on the left-hand side of the</p> <p>10 picture?</p> <p>11 A. You know, I don't remember. I think</p> <p>12 remember that there was one for each door, but I could</p> <p>13 be wrong.</p> <p>14 Q. Okay. You see where in the third picture</p> <p>15 where it's just showing the latch, you've got this</p> <p>16 stain running down the door?</p> <p>17 A. I do see a stain running down the door,</p> <p>18 yes.</p> <p>19 Q. I mean, it's a darkened part of the</p> <p>20 picture, right?</p> <p>21 A. Yes.</p> <p>22 Q. And if you look at the second picture, the</p> <p>23 picture in the middle, or the picture preceding, that</p> <p>24 same stain appears in that picture next to that latch,</p> <p>25 does it not?</p>	<p>138</p> <p>1 A. That might have been a typo.</p> <p>2 Q. Okay. All right. Let's talk about the</p> <p>3 women's restrooms. Now, we talked earlier, and I just</p> <p>4 want to make sure we're clear, when you and Mr. Lane</p> <p>5 went into the men's and the women's restrooms, I was --</p> <p>6 I was not there with you?</p> <p>7 A. You were not. As I remember, you were not</p> <p>8 physically inside the restrooms.</p> <p>9 Q. Was there anyone else physically inside</p> <p>10 the restrooms with you and Mr. Lane when you inspected</p> <p>11 those restrooms for the purposes of this Rule 34</p> <p>12 report?</p> <p>13 A. I don't remember anybody else being there.</p> <p>14 Q. Okay. Do you recall moving anything in</p> <p>15 the restrooms when you did the inspection?</p> <p>16 A. No. I did not move anything.</p> <p>17 Q. Okay. You did not move anything when you</p> <p>18 were in there?</p> <p>19 A. Well, I -- I opened the stall door, so I</p> <p>20 moved the stall door, opened the stall door. Besides</p> <p>21 that, no, --</p> <p>22 Q. Okay.</p> <p>23 A. -- I didn't move anything.</p> <p>24 Q. Okay. So under Section A, under "Women's</p> <p>25 Restrooms," you state that the ISA signage is not</p> <p>140</p>

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<p>1 mounted on the latch side of the door, in violation of 141</p> <p>2 4.30.6, and your recommendation is to move it to the</p> <p>3 latch side of the door to comply with 703 of the 2010</p> <p>4 standards; is that correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. Have you ever read Section 704.2 of</p> <p>7 the 2010 standards?</p> <p>8 A. I'm sure I have.</p> <p>9 Q. Okay. And it -- and so you may remember,</p> <p>10 then, that it says that signs with tactile characters</p> <p>11 can be mounted to the front or the push side of a door</p> <p>12 if the door has closures and no hold-open devices. Do</p> <p>13 you recall that?</p> <p>14 A. It has closures and no-hold, that is --</p> <p>15 that is correct.</p> <p>16 Q. Okay. So if this door has closures and no</p> <p>17 hold-open devices, then this door would, in fact, be</p> <p>18 compliant so long as the sign on the front of this door</p> <p>19 is on the push side of the door and has tactile</p> <p>20 characters; is that right?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Let's assume that it doesn't.</p> <p>23 Let's assume that it doesn't have tactile characters or</p> <p>24 that it doesn't have -- or it actually has hold-open</p> <p>25 devices. Then in that case, the sign cannot be on the</p>	<p>1 underneath the lavatory as part of the 18 inches 143</p> <p>2 required beyond the latch side of the door so long as</p> <p>3 there is sufficient clearance underneath the lavatory;</p> <p>4 is that correct?</p> <p>5 A. That, I don't remember.</p> <p>6 Q. Okay. And your report doesn't include any</p> <p>7 measurements as to the height of this lavatory that you</p> <p>8 can see at the picture of the top left of page 8; is</p> <p>9 that correct?</p> <p>10 A. That's correct.</p> <p>11 Q. All right. Assuming that it did not</p> <p>12 provide 18 inches minimum beyond the latch side of the</p> <p>13 door due to the height of the lavatory, one -- what</p> <p>14 your report is saying is that one potential</p> <p>15 recommendation would be to remove that lavatory -- you</p> <p>16 say relocate, but let's assume there's nowhere to</p> <p>17 relocate it so you've got to remove it -- and that that</p> <p>18 would, in fact, then, provide the 18 inches minimum</p> <p>19 required and the 16 inches minimum perpendicular</p> <p>20 required in accordance with Table 404; is that correct?</p> <p>21 A. Or provide an automatic door opener.</p> <p>22 Q. Or provide an automatic door opener. So</p> <p>23 there you gave -- you gave two possible recommendations</p> <p>24 that Mr. Lane could suggest to Variety; is that right?</p> <p>25 A. Yes.</p>
<p>1 front side of the door. It would need to be moved to 142</p> <p>2 the right side of the door, which looks to be the push</p> <p>3 side, and mounted on the wall for Variety to be in</p> <p>4 compliance; is that correct?</p> <p>5 A. I believe so.</p> <p>6 Q. Okay. All right. Let's go to Section B,</p> <p>7 which is on page 8. You state that the lavatory</p> <p>8 obstructs the front approach because it doesn't allow</p> <p>9 for 18 inches minimum beyond the latch side of the door</p> <p>10 and 60 inches minimum perpendicular to the doorway; is</p> <p>11 that correct?</p> <p>12 A. That's correct.</p> <p>13 Q. And then we've got a trash can that's</p> <p>14 there right by the door as well; is that right?</p> <p>15 A. That's correct.</p> <p>16 Q. Okay. So lavatory refers to sink; is that</p> <p>17 right?</p> <p>18 A. That's correct.</p> <p>19 Q. I didn't realize that until I started</p> <p>20 doing these cases. I was thinking, what, I don't even</p> <p>21 see a lavatory in this picture.</p> <p>22 A. It's okay. I didn't know what a water</p> <p>23 closet was. I was like, what is that?</p> <p>24 Q. Okay. Let's see here. Now, under 4.2.4.1</p> <p>25 of the 1991 standards, you can, in fact, use the area</p>	<p>1 Q. All right. So if Variety, in fact, did 144</p> <p>2 remove that sink or put an automatic door in there</p> <p>3 pursuant to your recommendations, there would, in fact,</p> <p>4 be no violation with respect to the door into the</p> <p>5 women's restroom; is that right?</p> <p>6 A. Well, I think there would be two issues</p> <p>7 here. I did not measure the second lavatory that was</p> <p>8 there. And even with the first one removed, the -- the</p> <p>9 best option would be the automatic door opener because</p> <p>10 then you don't have to worry about that trash can being</p> <p>11 there or it's not there or when it's moved and when</p> <p>12 it's not moved. You don't have to worry about that</p> <p>13 anymore, okay? The automatic door solves all these</p> <p>14 issues. I did not measure the second lavatory. If, in</p> <p>15 fact, that 60 inches is still not there, that may be an</p> <p>16 obstruction also. But I -- I would have to go back and</p> <p>17 remeasure it.</p> <p>18 Q. And that would also depend upon whether or</p> <p>19 not there was 18 inches of minimum clearance underneath</p> <p>20 that second lavatory?</p> <p>21 A. That would be true.</p> <p>22 Q. All right.</p> <p>23 A. Well, again, it's the -- yes, that would</p> <p>24 be true.</p> <p>25 Q. Okay. Under Section C, it appears you've</p>

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<p>1 taken issue with the placement of an additional toilet 2 paper roll on top of the hand dryer. Do you recall -- 3 there's a -- there's a portion of a sign in the 4 background of this picture. Do you recall what that 5 sign says?</p> <p>6 A. No, I do not.</p> <p>7 Q. And the only issue with respect to this 8 particular picture is just the placement of that one 9 roll of toilet paper; is that right?</p> <p>10 A. Yes. Let's say the client is on the 11 restroom and he looks at the toilet paper dispenser; 12 there's nothing there. This, I take it, is the 13 replacement in case you run out. If this is located 14 too high, he's got no way of reaching it.</p> <p>15 Q. Right. But all I'm asking is you show the 16 picture of the hand dryer, but you're only -- the only 17 issue you're talking about is the --</p> <p>18 A. Oh, that's true.</p> <p>19 Q. -- roll of -- the toilet paper?</p> <p>20 A. Yeah, the paper -- I'm sorry -- the hand 21 dryer is correct.</p> <p>22 Q. Okay. No, I totally understand about --</p> <p>23 A. Yes.</p> <p>24 Q. -- not being able to get to the toilet 25 paper. Okay.</p>	<p>145</p> <p>1 Q. Okay. So what -- if at the time you did 2 this report, Variety had been running the store since 3 1980 and had never updated its bathrooms, which is 4 entirely possible, and it had this type of mechanism on 5 the door, does the 1991 ADA requirements require it to 6 come up to those 1991 regs, or does it allow you to 7 maintain your facility in the fashion that it's in 8 since it's in existence before 1991 and has not been 9 altered?</p> <p>10 A. Well, I believe in 1991, the standards 11 also require a pull on both sides of the stall door.</p> <p>12 Q. Right. But what I'm saying is, if --</p> <p>13 A. So if it didn't comply with 1991, still 14 in 2010, they would -- they would have to comply.</p> <p>15 Q. Right. What you said earlier -- and I 16 agree with what you're saying. I'm asking a different 17 question.</p> <p>18 A. Okay.</p> <p>19 Q. At least I'm trying to.</p> <p>20 A. All right.</p> <p>21 Q. So if Roses builds -- if Variety builds 22 this Roses in 1992 and installs this stall, right, it's 23 out of compliance with 1991. And it's out of 24 compliance all the way up to 2010, and then it's out of 25 compliance from 2010 forward.</p>
<p>1 A. I mean, you and I would have difficulties 2 like that either, you know, have to get out of the 3 stall.</p> <p>4 Q. All right. On page 9, Section D, you say, 5 "The stall door does not provide the required hardware, 6 in violation of Section 4.13.9," and you recommend that 7 door hardware that complies with Section 309 be 8 installed. And what -- with respect to door hardware, 9 the -- my reading of the 2010 ADA standards is that you 10 have to use U-shaped handles or a lever-operated 11 mechanism that does not require a tight grasp or 12 pinching or twisting. Would that be similar to your 13 recollection?</p> <p>14 A. On both sides of the stall door.</p> <p>15 Q. Okay. And the reason is that if you have 16 someone who does not have the use of their hands and 17 cannot grasp, pinch or twist, that's why you would need 18 to have that particular -- that's why the ADA requires 19 that --</p> <p>20 A. Yes.</p> <p>21 Q. -- you have that particular hardware; is 22 that correct?</p> <p>23 A. On both sides of the door so you can open 24 it, and then once you're inside, to be able to close 25 the door.</p>	<p>146</p> <p>1 A. Right.</p> <p>2 Q. What about business that were in business 3 prior to the promulgation of the 1991 standards that 4 had not done any modifications to their restrooms? So 5 Bob's Restaurant -- let's go back to Bob, okay? Bob's 6 Restaurant opened in 1978. He hasn't done anything to 7 change -- his dad helped him open it. He doesn't want 8 to change anything. He hasn't done anything to modify 9 any portion of the building, including the women's 10 restroom. And the women's restroom in Bob's Restaurant 11 doesn't have the required handles under the 1991 regs. 12 But he hasn't done anything to them since 1978.</p> <p>13 A. Are you referring to a grandfather clause?</p> <p>14 Q. Yeah.</p> <p>15 A. There is no such thing that I'm aware of.</p> <p>16 Q. Okay. Under the 1991 standards, there's 17 no such thing?</p> <p>18 A. As a grandfather clause.</p> <p>19 Q. Right. Okay. So if your restroom was not 20 compliant the day before the ADA came out, then the day 21 after it came out, you had to start working towards 22 compliance?</p> <p>23 A. Yes. That was the whole reason in putting 24 in the law.</p> <p>25 Q. But the same is not true for 2010?</p> <p>148</p>

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<p>1 A. 2010 allowed you safe harbors.</p> <p>2 Q. Right.</p> <p>3 A. But you still have to comply.</p> <p>4 Q. Right.</p> <p>5 A. It's just they're allowing you now, or at</p> <p>6 least there was a time even after they were put out,</p> <p>7 you could actually choose which standard you wanted to.</p> <p>8 That period is gone.</p> <p>9 Q. Uh-huh.</p> <p>10 A. Okay. This is a hypothetical question,</p> <p>11 the one that you're asking, because in reality, this</p> <p>12 bathroom has been substantially altered since -- since</p> <p>13 my first inspection. So, hypothetically, you know,</p> <p>14 I've answered that question. But in this example, this</p> <p>15 one has been substantially altered.</p> <p>16 Q. Right. I just was trying to understand</p> <p>17 whether or not -- I think safe harbor and grandfather,</p> <p>18 they're different in the sense, one, you're talking</p> <p>19 about violations, and one you're talking about which</p> <p>20 standard applies. But it's the same thing. It's just</p> <p>21 the same safe harbors of 2010 were not in the 1991.</p> <p>22 A. Well, even -- even historical buildings</p> <p>23 built in the 1800's, there are ADA rules, although less</p> <p>24 -- a lot less stringent, that they have to comply with.</p> <p>25 So the -- so it would be reasonable to assume that if</p>	<p>1 been back in the women's restroom at Roses?</p> <p>2 A. No, I have not.</p> <p>3 Q. Okay. Going to Section E of the report on</p> <p>4 page 9, you state that the toilet paper dispenser is</p> <p>5 not appropriately mounted and that the location of the</p> <p>6 roll of toilet paper requires a tight grasp. Let's</p> <p>7 take the second issue. If the toilet paper roll had</p> <p>8 been in the toilet paper dispenser, then that -- this</p> <p>9 tight grasp issue would have not been a violation; is</p> <p>10 that correct?</p> <p>11 A. As long as that dispenser was free -- free</p> <p>12 -- free --</p> <p>13 Q. Free flowing?</p> <p>14 A. -- free flowing, yes.</p> <p>15 Q. Okay.</p> <p>16 A. That would be correct.</p> <p>17 Q. Okay. And so when you say that the toilet</p> <p>18 paper dispenser needs to be mounted between seven to</p> <p>19 nine inches in front of the water closet, that's as if</p> <p>20 you drew a line from the very front of the toilet to</p> <p>21 the wall and then measured out seven to nine inches,</p> <p>22 that's where the toilet paper dispenser would have to</p> <p>23 be installed; is that correct?</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. And you don't mention it here --</p>
<p>1 your store was in 1980 and the law came about in 1992</p> <p>2 -- or 1991, you know, you would -- you had until 1992,</p> <p>3 I believe, to fix everything. You know, you were still</p> <p>4 held responsible for that to fix everything.</p> <p>5 Q. Uh-huh.</p> <p>6 A. Now we're in 2014, different issue, just</p> <p>7 like what happened in 2010 just recently. Before it</p> <p>8 wasn't required you had to have pool lifts and spa</p> <p>9 lifts, right? Then that was a big thing. 2010</p> <p>10 mandated it, that not only each spa and each pool has</p> <p>11 to have a pool lift. They're required. And it cannot</p> <p>12 be temporary. It has to be fixed, permanent, okay?</p> <p>13 There was a big to-do about that with the</p> <p>14 hotel industry and it went to Department of Justice.</p> <p>15 Department of Justice delayed actually enforcing that</p> <p>16 particular action and gave them another six months to</p> <p>17 comply, and that period of time is over now. And now</p> <p>18 you see a lot of hotels -- I see a lot of them now</p> <p>19 where the pool lifts are there. The spa pool lifts are</p> <p>20 there.</p> <p>21 It's the same thing. Once the law is,</p> <p>22 then, yes, you've got to -- you have to bring it up to</p> <p>23 standard. But then they -- they did allow you to -- to</p> <p>24 exercise the safe harbors if you complied with 1991.</p> <p>25 Q. Okay. Since doing this report, have you</p>	<p>1 let's see -- or do you? You do mention that the outlet</p> <p>2 of the dispenser has to be between 15 and 48 inches</p> <p>3 above the finished floor, but it doesn't appear there's</p> <p>4 any measurement as to the actual height of this</p> <p>5 dispenser; is that correct?</p> <p>6 A. That's correct. Usually when there's not</p> <p>7 a measurement, it's because it was within --</p> <p>8 Q. Compliance?</p> <p>9 A. -- compliance.</p> <p>10 Q. Okay. So all that has to happen is the</p> <p>11 structural modification of moving this toilet dispenser</p> <p>12 out to be in front of the water closet by seven to nine</p> <p>13 inches for that violation to be satisfied?</p> <p>14 A. Right. To move that paper towel -- excuse</p> <p>15 me -- the toilet paper dispenser, and also to maintain</p> <p>16 it with toilet paper and not the way that it's</p> <p>17 portrayed there in the picture. And the tight grasp</p> <p>18 means they're grasping behind, in this particular</p> <p>19 picture, grabbing that toilet paper. If they have bad</p> <p>20 dexterity issues, that toilet paper is rolling down the</p> <p>21 floor and they'll never be able to use it.</p> <p>22 Q. So you cite to 4.27.4 in this part of the</p> <p>23 report. If you'd turn to page 38 of your report for</p> <p>24 me, it appears to me that the restriction against tight</p> <p>25 grasp and pinching or twisting applies only to controls</p>

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<p>1 and operating mechanisms. Do you see that in 4.27.4? 2 A. Yes. 3 Q. And then if you turn to page 36 with 4 respect to dispensers, all the 1991 ADA standard said 5 was, "The toilet paper dispenser shall be installed 6 within reach, as shown in dispensers that control 7 delivery, and not permit continuous paper flow, shall 8 not be used." I'm not sure that makes sense. But do 9 you know, is there a graph -- "Dispensers" in this 10 section is capitalized. Do you know what that refers 11 to? 12 A. I'm sorry. Let me get to the -- 13 Q. Sure. Page 36 -- 14 A. Page 36. 15 Q. -- Section 4.16.6. 16 A. .6. 17 Q. It says, "Toilet" -- basically what it 18 says is, "Toilet papers -- toilet paper dispensers 19 shall be installed within reach" and "as shown in 20 dispensers that control delivery or not permit 21 continuous paper flow, shall not be used." Do you know 22 whether the 1991 ADA standards have particular 23 measurements with respect to toilet paper dispensers or 24 are the only ones found in the 2010 standards in this 25 section that you cite to page 9?</p>	<p>153</p>	<p>1 components of the stall. 2 Q. Okay. If you'd turn to page 10, we're now 3 moving on to the men's restrooms. Again, you list the 4 signage location to be a violation. And as we 5 discussed with the women's room, 704.2 does actually 6 allow for that sign to be located where it is, so long 7 as it's on the push side of the door and there's no 8 hold-open devices; is that correct? 9 A. That's correct. 10 Q. Okay. 11 A. As long as there's no hold-open devices. 12 Q. But if there were, then what Variety would 13 need to do is to move that sign to the left side of the 14 door in this picture; is that right, assuming that 15 that's the push side of the door? 16 A. Or the latch side, yes. 17 Q. Yeah, okay. Latch side. Thank you. 18 A. Right. 19 Q. All right. 20 A. I believe they have. I mean, that's what 21 I visually saw today. 22 Q. Okay. So this re- -- this violation has 23 been remedied; is that right? 24 A. Yes. 25 Q. Okay, great. Okay. With Section B, we</p>	<p>155</p>
<p>1 A. There are -- there are figures for the 2 toilet paper dispensers that are in the ADA, the 1991. 3 The reason why this particular one is brought to 2010 4 is because of the massive alteration that's been done 5 to this particular toilet. So the dispenser would have 6 to be brought to 2010 standards. 7 Q. Okay. And how do you know that there's 8 been massive alterations to this water closet -- to 9 this toilet? 10 A. Well, you can -- you can see from the 11 pictures that there's this wide area here. 12 Q. And are you pointing to the picture at the 13 top of page 9 on the left? 14 A. Yes. 15 Q. Okay. 16 A. Okay. And it looks like -- it looks like 17 there's been a partition moved. It looks like there's 18 been plumbing moved. 19 Q. Okay. And so based upon that visual 20 inspection, your belief is that this water closet went 21 through substantial renovations since 1991? 22 A. Actually, the stall itself. 23 Q. The stall itself, okay. 24 A. And everything in the stall. Well, not 25 everything, but the stall itself and different</p>	<p>154</p>	<p>1 again -- you again allege that there's not the 18 2 inches beyond the latch side and the 16 inches minimum 3 perpendicular, and it appears that you've got 4 measurements from the top of the sink to the door in 5 the wall; is that correct? 6 A. As close as I could -- 7 Q. Okay. 8 A. -- and take the pictures. 9 Q. And there's no -- there's no measurement 10 in here as to whether or not there is sufficient 11 clearance underneath the lavatory to allow for the 18- 12 inch minimum beyond the latch side; is that right? 13 A. That's correct. 14 Q. All right. Assuming there was not, then 15 can you say from your inspection whether removal of 16 this sink would have created 18 inches beyond the latch 17 side of the door and 16 inches minimum perpendicular to 18 the doorway? 19 A. From this picture, I can't tell. 20 Q. Okay. 21 A. Because we may run into the same problem 22 with the two lavatories. I can't tell if there's just 23 the one or if there's two. 24 Q. Okay. But you -- as you sit here today, 25 you don't know -- you don't know; is that what you're</p>	<p>156</p>

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<p>1 saying? 2 A. I don't remember. 3 Q. Okay. Going to page 11 and Section C, you 4 say that the door requires greater than five pounds of 5 pressure to operate? 6 A. Yes. 7 Q. Is door pressure something that fluctuates 8 regularly? And by that, I don't mean from one door to 9 another, but I mean once you set the pressure required 10 to open the door, is it something that changes, lessens 11 or increases on a daily or weekly basis? 12 A. It requires maintenance. 13 Q. How often does it require maintenance? 14 A. I don't know. It depends. It depends on 15 use. It depends -- there's a -- there's a lot of 16 variables. 17 Q. And can you tell from looking at this 18 picture whether or not -- I mean, can you tell what 19 that reading is? Let me back up. Strike that. 20 What device is this in this picture on the 21 right at the top of page 11? 22 A. Okay. This is what's called a push-pull 23 measuring device, door pressure device. 24 THE WITNESS: You okay, Chris? 25 MR. PURYEAR: Napkin?</p>	<p>157 1 Q. All right. Never use any calibration? 2 A. It's spring -- spring loaded. It's always 3 the same. 4 Q. It's always the same? The spring doesn't 5 ever wear out? 6 A. I imagine it might. Mine never has, but. 7 Q. How old is your push-pull mechanism that's 8 pictured in this picture? 9 A. I'd say it's about five years. 10 Q. About five years. Who makes it? 11 A. That, I don't remember. 12 Q. Do you have it with you today? 13 A. I do not. 14 Q. Okay. And so all that's required under 15 the ADA is that the push or pull pressure required to 16 open the door is less than five pounds? 17 A. Less than five pounds for interior doors. 18 Q. For interior doors. That's right. 19 A. Yes. 20 Q. Because there's a different standard for 21 exterior, right? 22 A. Not so much, but, yes. 23 Q. Okay. 24 A. The reason being is -- is the exterior 25 doors have to be greater than five pounds and it's a</p>
<p>158 1 MR. LANE: I'm fine. I'm good. 2 MR. PURYEAR: Okay. Water down 3 the wrong pipe? 4 MR. LANE: Yeah. 5 MR. PURYEAR: Do you need a 6 break? 7 MR. LANE: No. Go ahead. 8 MR. PURYEAR: Okay. All right. 9 Q. And so it's a push-pull device? 10 A. Yes, push-pull. 11 Q. And so how do you -- how do you use it? 12 A. Different ways of using it. You -- first 13 of all, you set -- you set the little ring right here, 14 this black ring -- 15 Q. Uh-huh. 16 A. -- to zero here, okay? Then you go on -- 17 in this particular case, I went on the push side of the 18 door, which is the outside, and pushed in. And you go 19 to 45-degree angle and then stop and measure it. 20 Q. Okay. 21 A. In other words, you open the door simply 22 by using the device. 23 Q. And is the device something that you have 24 to calibrate? 25 A. No.</p>	<p>159 1 fire issue. 2 Q. Okay. 3 A. Okay. 4 Q. Let's go to Section D on page 11. You 5 raised the location of the toilet paper and also the 6 toilet paper dispenser not being mounted appropriately, 7 and then you don't have any other complaints about the 8 grab bars or the toilet, which you said earlier means 9 that those elements of this facility -- of this part of 10 the facility would be in compliance; is that right? 11 A. Yes, in this particular paragraph, yes. 12 Q. Okay. So, then, with respect to the 13 toilet paper dispenser, again, if you look at the 14 picture on the right, bottom right of page 11, you 15 would just need to draw a line straight out from the 16 front part of the toilet and then measure seven to nine 17 inches off of that to appropriately place the toilet 18 paper dispenser; is that correct? 19 A. Yeah, as long as it was 15 inches minimum 20 to 48 inches maximum. 21 Q. Okay. Now, looking at these two pictures, 22 Mr. Childers, it appears to me that -- are these two 23 pictures the same -- are the same toilet? 24 A. Yes. 25 Q. Okay. All right. In one, you're just</p>

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<p>1 looking at the toilet from the entryway, and the one, 161</p> <p>2 you're almost standing right over the toilet like</p> <p>3 you're getting ready to use it looking down at the</p> <p>4 floor; is that right?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. Now, you told me earlier that when</p> <p>7 you and Mr. Lane were in the bathroom, you didn't move</p> <p>8 anything, yet when I look at these two pictures, in the</p> <p>9 picture on the left, the toilet paper roll is sitting</p> <p>10 on top of the dispenser, and then I look at the picture</p> <p>11 on the right where you're measuring the violation --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- and the picture is now sitting -- the</p> <p>14 toilet paper is now sitting on the floor. And you just</p> <p>15 told me that these two pictures are of the same toilet.</p> <p>16 A. Uh-huh.</p> <p>17 Q. So did someone other than you or Mr. Lane</p> <p>18 move that roll of toilet paper?</p> <p>19 A. Actually, I don't -- it might have fallen</p> <p>20 down. I could tell you I did not physically move it.</p> <p>21 I do not physically move anything. I record exactly</p> <p>22 what's there when I see it, period. You can also see</p> <p>23 -- so it may have -- it may have gotten knocked over</p> <p>24 when I did a -- when I did the measurement. I'm not</p> <p>25 sure. But in the second picture, you see it's probably</p>	<p>1 dispenser, right? 163</p> <p>2 A. Right.</p> <p>3 Q. Which I will admit is not necessarily the</p> <p>4 best place for it, not the proper place, necessarily,</p> <p>5 but it's sitting right there on top of the dispenser.</p> <p>6 Then it somehow mysteriously gets on the floor by the</p> <p>7 time you take the second picture, which you're telling</p> <p>8 me under oath that you didn't move.</p> <p>9 A. I did not move it.</p> <p>10 Q. And that's fine. Okay. You tell me you</p> <p>11 didn't move it. Then it must have -- you know, it fell</p> <p>12 on the floor somehow. But then you're now measuring to</p> <p>13 that roll of toilet paper in the second picture.</p> <p>14 A. No. No. I'm measuring to the paper to--</p> <p>15 -- I mean the toilet paper dispenser. I'm not</p> <p>16 measuring that roll of toilet paper. Even if I was, it</p> <p>17 doesn't -- it doesn't matter. That measurement doesn't</p> <p>18 matter at all, where that roll of toilet paper is.</p> <p>19 Q. Okay. So you're -- you're --</p> <p>20 A. I'm measuring the dispenser itself.</p> <p>21 Q. So when you measured the dispenser,</p> <p>22 though, you told me that you measure from the front of</p> <p>23 the water closet; is that right?</p> <p>24 A. Yes.</p> <p>25 Q. And that would be -- I'm going to point it</p>
<p>1 that same roll, I guess, and you also see another roll 162</p> <p>2 that's right beside it.</p> <p>3 Q. Right. And if you look at the first</p> <p>4 picture, you have what's an empty -- what looks to me</p> <p>5 like an empty roll --</p> <p>6 A. Right.</p> <p>7 Q. -- on the floor, right, --</p> <p>8 A. Well, --</p> <p>9 Q. -- where someone may have used the toilet</p> <p>10 and emptied the roll and it got on the floor. I mean,</p> <p>11 it doesn't look to me like there's much of any toilet</p> <p>12 paper on there.</p> <p>13 A. Right. Right.</p> <p>14 Q. But then you look at the second picture</p> <p>15 and that roll is -- the full roll is now sitting on the</p> <p>16 floor. And what you're saying is it might have</p> <p>17 accidentally fallen over?</p> <p>18 A. When I -- when I was taking my</p> <p>19 measurements, it might have gotten knocked over.</p> <p>20 Q. And so then you decided to take a</p> <p>21 measurement of it once it had been knocked on the floor</p> <p>22 by either you or Mr. Lane?</p> <p>23 A. What are you talking about?</p> <p>24 Q. Well, look, it's sitting -- on the left</p> <p>25 picture it's sitting on top of the toilet paper</p>	<p>1 out to you right here. Look at this, just so I -- I 164</p> <p>2 want to make sure you're seeing the same thing I am.</p> <p>3 When you look at picture 11, when you say the front of</p> <p>4 the --</p> <p>5 A. Oh, your pictures are a lot clearer than</p> <p>6 mine. This is what I'm looking at --</p> <p>7 Q. Okay. Yeah.</p> <p>8 A. -- when I'm trying to say --</p> <p>9 Q. Well, here -- here's one.</p> <p>10 A. Okay. All right.</p> <p>11 Q. All right. So on the picture of the</p> <p>12 bottom right-hand corner of 11, this is -- right here,</p> <p>13 this is the front of the toilet, the part that</p> <p>14 protrudes the most from the wall; is that correct?</p> <p>15 A. That's correct.</p> <p>16 Q. All right. And so if you were measuring</p> <p>17 from the front of the toilet -- my line is not very</p> <p>18 straight -- your -- your tape measure should stop where</p> <p>19 I just drew a line, and that's the point at which you</p> <p>20 would measure from the front of the toilet to determine</p> <p>21 the location of the toilet paper dispenser; is that</p> <p>22 right?</p> <p>23 A. Uh-huh.</p> <p>24 Q. And so what you're saying is you're not</p> <p>25 measuring to this toilet roll; you're actually</p>

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1 measuring from the front of the toilet to measure this; 165
2 is that right?
3 A. Let me take a look at the picture.
4 Q. Okay. Hold on a second.
5 MR. PURYEAR: Can I see your
6 copy, Chris? Well, none of our pictures
7 are very clear, are they?
8 Q. What I'm asking you for is on this
9 particular picture can you tell -- on my -- on my copy
10 can you tell where your measuring stick stops and
11 starts?
12 A. I think from here -- it looks like my
13 measuring stops here, okay?
14 Q. Okay.
15 A. Which is this part.
16 Q. Okay. So you're not measuring the toilet
17 paper roll that's no longer sitting on top of the --
18 A. That's correct.
19 Q. -- toilet paper dispenser?
20 A. That has nothing to do with --
21 Q. Okay.
22 A. -- any citing. I don't even think I cited
23 it except for that it wasn't in the roll.
24 Q. Now let's go to page 12. And I'll be
25 honest with you, my picture doesn't look any better

1 than yours here, but you say that the stall door does 166
2 not provide the required hardware. Now, you went back
3 today. Did you go in the men's room?
4 A. Yes.
5 Q. Had the proper hardware been installed on
6 this particular door?
7 A. As I recall, yes.
8 Q. Great. When you went back today, you said
9 you spent ten minutes in the store and you went to the
10 majority of the store. That's what you said; is that
11 correct?
12 A. I walked through the store, yes.
13 Q. Did you take any -- any measurements while
14 you were in the store?
15 A. No.
16 Q. Okay. But I assume you did a visual
17 inspection?
18 A. Yes.
19 Q. All right. I'm not smirking. I'm smiling
20 just because it's pretty common sense. I mean --
21 A. Well, yeah.
22 Q. Did you do any shopping while you were
23 there?
24 A. Not today, no. I went to the Food Lion
25 afterwards.

1 Q. Okay. From your visual inspection today, 167
2 what violations of the ADA did you see?
3 A. Pretty soon we'll get this place
4 completely compliant because it seems like every time I
5 write a report, things are changed and modified, and
6 that's a good thing. So today I saw the sa- -- similar
7 things, the 36-inch path was still not maintained.
8 Q. Where -- where in the store did you see
9 that?
10 A. Pretty much in the same areas that you
11 were referring to earlier, in the -- the clothing
12 sections.
13 Q. Okay. Did you see a 36-inch path not
14 maintained in any other sections of the store, other
15 than the clothing sections?
16 A. I did see that since my Rule 34 report,
17 all the major -- the major aisles that we had spoke
18 about with the supporting beams were moved and modified
19 and were able to be modified without using merchandise
20 -- without losing merchandise, so that was good.
21 Q. And when you say that they had been
22 modified, my understanding is that the actual very
23 large shelving -- I mean, they're eight-foot shelving
24 racks --
25 A. Right.

1 Q. -- they've -- they've actually been 168
2 physically moved --
3 A. Yes.
4 Q. -- to where the support beams that support
5 the ceiling are no longer a barrier?
6 A. No longer an obstacle, yes.
7 Q. All right. Okay. So all issues with the
8 support beams have been remedied. You said you visited
9 the men's room?
10 A. Yes.
11 Q. Did you see any violations with respect to
12 the men's room?
13 A. Yes.
14 Q. What did you see?
15 A. The stall door still not self-closing.
16 And, like I said, I didn't measure, so visually I did
17 see that one of the lavatories had been removed, and it
18 looks like there's an existing lavatory. Again,
19 visually, I'm not sure whether the latch-side clearance
20 is still obstructed by the existing lavatory or not.
21 I'm just not sure.
22 Q. Now, is there any other lavatories in the
23 bathroom?
24 A. No. That's the only one.
25 Q. Do you know if code requires you to have a

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<p>1 lavatory in the bathroom?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 A. That's why I still believe the automatic</p> <p>5 door opener is the solution.</p> <p>6 Q. But you didn't take any measurements, as</p> <p>7 you said, when you were in there?</p> <p>8 A. I did not, no.</p> <p>9 Q. Anything else in the men's room?</p> <p>10 A. No.</p> <p>11 Q. Okay. So we talked about the clothing</p> <p>12 sections. We talked about support beams. We talked</p> <p>13 about the men's room. Did you see any violations with</p> <p>14 any other aspect of the store?</p> <p>15 A. Yes. There were still some protruding</p> <p>16 objects.</p> <p>17 Q. And where did you see the protruding</p> <p>18 objects?</p> <p>19 A. And, actually, yes, there's two things.</p> <p>20 The protruding objects were still -- oh, gosh. I don't</p> <p>21 remember at this point.</p> <p>22 Q. Okay.</p> <p>23 A. I think it may have still been around the</p> <p>24 -- where there were some umbrellas or something. I</p> <p>25 think that still may be an existing issue.</p>	<p>171</p> <p>1 A. That's correct.</p> <p>2 Q. All right. Anything else?</p> <p>3 A. I think that's it.</p> <p>4 Q. Okay. Let's take a short break.</p> <p>5 (OFF THE RECORD AT 2:51 P.M.)</p> <p>6 (BACK ON THE RECORD AT 2:59 P.M.)</p> <p>7 Q. All right, Mr. Richardson [sic], when we</p> <p>8 left off, we just finished about talking -- oh, I'm</p> <p>9 sorry. Mr. Childers. I apologize. When we left off,</p> <p>10 we had just finished talking about your Section E on</p> <p>11 page 12 of your report, --</p> <p>12 A. Yes.</p> <p>13 Q. -- which is Deposition Exhibit 6. If you</p> <p>14 would, turn to page 13 for me. And this appears to be</p> <p>15 a page and a half portion of the report that's entitled</p> <p>16 "Recommendations of the Rule 34 Inspection." It</p> <p>17 appears to me that these are just a copy-and-paste of</p> <p>18 all the recommendations that were found under each of</p> <p>19 the individual sections we just talked about; is --</p> <p>20 A. Yes.</p> <p>21 Q. -- that correct?</p> <p>22 A. It's done -- yes.</p> <p>23 Q. Just make sure I finish for her purposes.</p> <p>24 But is that -- am I correct?</p> <p>25 A. Yes.</p>
<p>170</p> <p>1 Q. But you're not -- you can't recall exactly</p> <p>2 what --</p> <p>3 A. Right. I'm not sure. I'm not sure at</p> <p>4 all. And I think there was one area beyond the</p> <p>5 clothing section where there were still -- I take that</p> <p>6 back. We'll just leave that alone.</p> <p>7 Q. Okay. So what we have is there's not a</p> <p>8 36-inch path in the clothing sections. All the issues</p> <p>9 with the support beams have been satisfied. The only</p> <p>10 violations in the men's room were that the stall door</p> <p>11 was not self-closing and that you cannot visually</p> <p>12 determine whether the 18 inches and 16 inches required</p> <p>13 were met?</p> <p>14 A. Also, I just remembered that trash can was</p> <p>15 still obstructing the door in the men's bathroom. So</p> <p>16 that seems to be -- that's still failure to maintain.</p> <p>17 It still seems to be existing and an ongoing issue.</p> <p>18 Q. And then -- all right. So we've got the</p> <p>19 stall door. You couldn't tell about the measurements.</p> <p>20 The trash can in the men's room. You didn't go into</p> <p>21 the women's room?</p> <p>22 A. Did not go into the women's room.</p> <p>23 Q. Good job. And then you say that you saw</p> <p>24 that there were still protruding objects but that you</p> <p>25 can't recall what they were?</p>	<p>172</p> <p>1 Q. Okay. So there's nothing additional in</p> <p>2 this section of the report that we have not covered in</p> <p>3 this deposition?</p> <p>4 A. That is correct.</p> <p>5 Q. All right. Have you ever heard of a man</p> <p>6 named Michael Chenail?</p> <p>7 A. I have heard of him.</p> <p>8 Q. What have you heard about him?</p> <p>9 A. I've heard that he's a ADA expert in some</p> <p>10 part of North Carolina.</p> <p>11 Q. Okay.</p> <p>12 A. Never met him. Don't know much about him.</p> <p>13 Q. Okay. Have you ever read any ADA report</p> <p>14 authored by Mr. Chenail?</p> <p>15 A. I don't recall.</p> <p>16 Q. Okay. When you and I met the first time</p> <p>17 at the Roses, at the end of that meeting, you, me and</p> <p>18 Mr. Lane had a little bit of discussion about</p> <p>19 settlement. Do you remember that?</p> <p>20 A. I remember we had a discussion about</p> <p>21 possible settlement.</p> <p>22 Q. Okay. What do you recall about that</p> <p>23 conversation?</p> <p>24 A. I recall that -- from my understanding --</p> <p>25 obviously, I've not been involved with the majority of</p>

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<p>1 the settlement discussions that have been had by you</p> <p>2 and Mr. Lane, so I was not privy to that. Don't know</p> <p>3 all the ins and outs of details. My understanding was</p> <p>4 -- is that as part of the settlement, that the</p> <p>5 negotiations included -- the negotiations included some</p> <p>6 type of a global agreement that the group and/or</p> <p>7 plaintiff would never sue another Roses or Variety</p> <p>8 store -- let's put it this way, a Variety store --</p> <p>9 Q. Uh-huh.</p> <p>10 A. -- again forever and anon.</p> <p>11 Q. Have you -- other than your conversations</p> <p>12 with Mr. Lane, if any, have you had any conversations</p> <p>13 about possible settlement with respect to Variety</p> <p>14 Stores with any other individual?</p> <p>15 A. With any other individual, no.</p> <p>16 Q. Okay. So you haven't talked to</p> <p>17 Mr. Richardson about it?</p> <p>18 A. About settling?</p> <p>19 Q. Uh-huh.</p> <p>20 A. We -- not this particular case. We may</p> <p>21 have talked about what was felt as far as being -- you</p> <p>22 know, what he would be interested in doing and about</p> <p>23 what the group interests were and so forth and maybe</p> <p>24 kind of come up with a comprehensive solution for this</p> <p>25 entire process.</p>	<p>173</p> <p>1 we should try to resolve -- not "we," but any type</p> <p>2 there's a -- any type of where there's a disagreement,</p> <p>3 there should be some type of a agreeable resolution.</p> <p>4 And I think in the ADA cases, in these ADA cases, that</p> <p>5 there should be because it really is black and white.</p> <p>6 There's really not to argue about -- I mean, nothing</p> <p>7 really to argue about. And eventually the creation of</p> <p>8 the universal design, you know, benefits everybody in</p> <p>9 society. So that's kind of my, you know, outlook on</p> <p>10 this in total, not specifically referring to this case.</p> <p>11 Q. In the last two years, what percentage of</p> <p>12 your salary is from your work relating to ADA lawsuits?</p> <p>13 A. About 90 percent is derived from plaintiff</p> <p>14 work, yes; 10 percent for either proactive or defendant</p> <p>15 work. I wish it were the other way around. Actually,</p> <p>16 I wish there wasn't any work to be done. I wish it was</p> <p>17 all done.</p> <p>18 Q. And I appreciate your answer to the</p> <p>19 question answering my next question, but let's just</p> <p>20 make sure we're on the same page here. My question was</p> <p>21 what is the overall percentage of your salary in the</p> <p>22 last two years that related to your work on ADA</p> <p>23 lawsuits, and you said 90 percent for plaintiffs' work</p> <p>24 and 10 percent for defendants' work. Are you saying</p> <p>25 that you did not have any other source of income in the</p>
<p>1 Q. And when you say "group interests," who</p> <p>2 are you referring to?</p> <p>3 A. I was referring to -- in this particular</p> <p>4 case, it would have been National.</p> <p>5 Q. And by that, you mean National Alliance</p> <p>6 for Accessibility?</p> <p>7 A. Yes.</p> <p>8 Q. Are you some kind of spokesperson for the</p> <p>9 group?</p> <p>10 A. I am not.</p> <p>11 Q. Do you ever try and help them recruit</p> <p>12 members?</p> <p>13 A. I do not.</p> <p>14 Q. Well, are you -- have you ever been</p> <p>15 involved -- I mean, I guess what I'm trying to</p> <p>16 understand is why would you be involved in settlement</p> <p>17 discussions at all if you're not the plaintiff in the</p> <p>18 case and you're not a member of NAA?</p> <p>19 A. No. Usually I'm not involved in</p> <p>20 settlement discussions.</p> <p>21 Q. But it sounded like you're involved in</p> <p>22 some. And it's not -- it's just a point of curiosity.</p> <p>23 A. Right.</p> <p>24 Q. You know, is there -- are there --</p> <p>25 A. No, I just try to -- I just envision that</p>	<p>174</p> <p>1 last two years, other than your work relating to ADA</p> <p>2 lawsuits?</p> <p>3 A. Restated differently, I'm stating that</p> <p>4 I've had no additional income for work -- any work not</p> <p>5 related to ADA Assistance Group. In other words, when</p> <p>6 I -- that's my income.</p> <p>7 Q. Okay. So when we talked about the -- if</p> <p>8 you were a pie, right, --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- you did two things. You did work</p> <p>11 related to ADA Assistant Group, and then you did what</p> <p>12 you called these various projects.</p> <p>13 A. Right.</p> <p>14 Q. And then you said of the slice that makes</p> <p>15 up various projects, that slice is only a couple of</p> <p>16 hours a week of the entire week, right?</p> <p>17 A. Right.</p> <p>18 Q. And then the only -- you could divide that</p> <p>19 slice into two pieces, and it would be the creation of</p> <p>20 the business plan for the National Accessibility</p> <p>21 Foundation, and then helping your son with his upcoming</p> <p>22 patent; is that right?</p> <p>23 A. That's correct.</p> <p>24 Q. Okay. Now, there's a separate pie, this</p> <p>25 income pie. What you're -- what I'm hearing you say --</p> <p>175</p>

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<p>1 and I just want to make sure we're clear -- is that 100 2 percent of that pie -- and that represents your income 3 for the last two years -- 100 percent of that is 4 related to your work for ADA Assistance Group? 5 A. That is correct. That's the way it 6 currently stands, yes. 7 Q. Okay. And then of that pie, 90 percent of 8 it is related to your plaintiffs' work, and then 10 9 percent is split between the proactive work and the 10 defendants' work you do? 11 A. That is correct. 12 Q. But you wish that slice of the pie was 13 bigger? 14 A. No. I wish it was the other way around. 15 Q. The other way around, okay. Why is that? 16 A. Why is that? Because that means -- what I 17 have experienced in other -- well, I'll just tell you 18 what my experiences are. I have marketed ADA 19 Assistance Group. I've gone out and talked with 20 business owners and so forth, and it's been a 21 tremendous uphill battle to get them to do anything 22 proactively. It just has been. In fact, if I -- if 23 that was my -- if that's all I did, I would starve, 24 okay? It just seems that there's no interest at all in 25 property owners removing these barriers. That's been</p>	<p>177 1 the barriers. 2 Q. For who to become compliant? 3 A. The facility itself, okay? I'm just 4 saying on average. 5 Q. And that's for shopping centers? 6 A. A small shopping center. 7 Q. All right. 8 A. Okay. So let's give the example of 50- to 9 \$100,000. That amortized -- that loan amortized over 10 five years is, what, at low interest/no interest rates? 11 It comes out to be somewhere between 5- and \$700, more 12 than likely. And I don't think there's too many 13 business owners that could not afford that over a 14 monthly period of time, given so many years to actually 15 make that happen. So if that was put into place, I -- 16 MR. LANE: Let him ask a 17 question, okay? 18 THE WITNESS: All right. Sorry. 19 Q. So what would happen if that was put into 20 place? 21 A. Well, I believe that more property owners 22 would take advantage of that and actually remove the 23 barriers and make a more universal design for 24 everybody. 25 Q. When did you -- so is NAF registered in</p>
<p>178 1 my experience, my personal experience. 2 Q. And you've never approached Variety Stores 3 with respect to marketing ADA Assistance Group; is that 4 right? 5 A. Unfortunately, this came up first. That 6 is true. So I -- obviously, I can't. I can't, while 7 these cases are ongoing. But that's also -- and I'm 8 not faulting property owners 100 percent because a lot 9 of the issues are -- especially in these times -- it 10 comes down to the economy, the economics and them 11 having the funds to do that. And that's what drove me 12 to start the National Accessibility Foundation, to kind 13 of fix that piece that's -- in my opinion that's been 14 missing, okay? 15 You go to a bank now that -- they don't 16 offer those types of loans and so forth. So I thought 17 that would -- that would help and assist. And if you 18 provide that piece, you might be able to get additional 19 owners to buy into that. Because let's say, for 20 example, a small -- a small business owner -- a small 21 shopping center, let's say. For them to come -- become 22 compliant, it probably would be an average of 50- to 23 \$100,000. 24 Q. Say that one more time. 25 A. For them to become complaint, to remove</p>	<p>180 1 Florida? 2 A. Yes. NAF is a registered nonprofit. 3 Q. When did you register it? 4 A. I believe it was 2011. 5 Q. All right. And how did NAF get its 6 funding in order to loan -- loan this money? 7 A. Actually, we're at that -- we're close to 8 being at that stage now. As I mentioned before, I'm 90 9 percent finished with the -- writing the business plan. 10 And then the next step is to go and seek funding from 11 large major corporations, and I believe we can also get 12 federal funds from the government. 13 MR. PURYEAR: I have no further 14 questions. 15 <u>CROSS EXAMINATION BY MR. LANE:</u> 16 Q. Mr. Childers, you did your Rule 34 17 inspection on August 8, 2013, right? 18 A. Yes. 19 Q. And did you find the Roses at 3020 North 20 Main Street, Hope Mills, North Carolina to be violative 21 of the ADA at that point in time? 22 A. Yes. 23 Q. And did you memorialize the areas of 24 noncompliance that you found in your Rule 34 inspection 25 report?</p>

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<p>1 A. Yes. 181</p> <p>2 Q. And is that Exhibit 6 to your deposition?</p> <p>3 A. Yes.</p> <p>4 Q. And did you revisit this same Roses store</p> <p>5 subsequent to the preparation of your report?</p> <p>6 A. Do you mean the date of the inspection --</p> <p>7 oh, you mean after this report?</p> <p>8 Q. Yes, sir.</p> <p>9 A. Yes.</p> <p>10 Q. And did you find that Roses had made some</p> <p>11 modifications to the store?</p> <p>12 A. Yes.</p> <p>13 Q. Did it appear to you that those</p> <p>14 modifications were designed to address some of the</p> <p>15 concerns that you raised in your Rule 34 report?</p> <p>16 A. Yes.</p> <p>17 Q. And did you revisit the Roses store that's</p> <p>18 the subject of this case today?</p> <p>19 A. Yes.</p> <p>20 Q. Today, as we sit here, is the store still</p> <p>21 noncompliant?</p> <p>22 A. Yes, sir. There are still some</p> <p>23 noncompliant issues.</p> <p>24 Q. And if the defendant's expert authored a</p> <p>25 report in December saying that as of December of 2013,</p>	<p>1 substantially the same. I did see and notice that the 183</p> <p>2 major shelving that we talked about before was moved</p> <p>3 away from the beams, so in that case -- in that</p> <p>4 particular instance, it did get better.</p> <p>5 Q. And is this -- have you seen similar</p> <p>6 problems in other Roses stores?</p> <p>7 A. Yes.</p> <p>8 Q. Would you characterize the failure to</p> <p>9 provide a 36-inch path of travel to be a chronic</p> <p>10 problem throughout the Roses stores that you have</p> <p>11 visited?</p> <p>12 A. Yes.</p> <p>13 Q. And approximately how many Roses stores</p> <p>14 have you had the opportunity to observe?</p> <p>15 A. I don't remember. Probably -- I'm</p> <p>16 guessing maybe somewhere between three and five.</p> <p>17 Q. And have you seen a similar problem with</p> <p>18 the lack of a 36-inch path of travel at every Roses</p> <p>19 store that you've had the opportunity to observe?</p> <p>20 A. Yes. They seem to have a systemic</p> <p>21 problem.</p> <p>22 Q. And the second thing that you identified</p> <p>23 was the men's restroom at the Roses that's the subject</p> <p>24 of this case still does not have a self-closing stall</p> <p>25 door; is that right?</p>
<p>1 that the store was fully compliant, would you disagree 182</p> <p>2 with that?</p> <p>3 MR. PURYEAR: Objection.</p> <p>4 A. Yes. I would disagree with fully</p> <p>5 compliant.</p> <p>6 Q. And you identified five areas of</p> <p>7 noncompliance that you observed as recently as today,</p> <p>8 right?</p> <p>9 A. Yes.</p> <p>10 Q. One was the 36-inch path of travel had not</p> <p>11 been maintained and was not present?</p> <p>12 A. Yes.</p> <p>13 Q. And you saw that at multiple locations</p> <p>14 throughout the store?</p> <p>15 A. Primarily in the clothing departments.</p> <p>16 Q. And was that the men's clothing and the</p> <p>17 women's clothing?</p> <p>18 A. As I remember, the women's -- the women's</p> <p>19 area. I don't remember whether or not the men's was or</p> <p>20 not.</p> <p>21 Q. And did you see any improvement in the</p> <p>22 path of travel since your Rule 34 inspection, or was it</p> <p>23 substantially the same?</p> <p>24 MR. PURYEAR: Objection.</p> <p>25 A. As far as the clothing section, it was</p>	<p>1 A. Yes. 184</p> <p>2 Q. How much would it cost, approximately, to</p> <p>3 remedy that problem?</p> <p>4 A. Probably less than \$50.</p> <p>5 Q. And you also identified the latch side</p> <p>6 clearance in the men's restroom looked to be</p> <p>7 insufficient; is that right?</p> <p>8 A. It looked to be that there was not enough</p> <p>9 maneuvering clearance still.</p> <p>10 Q. And approximately what would you estimate</p> <p>11 the cost to remediate that issue to be?</p> <p>12 A. To install an electric door opener which</p> <p>13 would prevent different things obstructing that -- that</p> <p>14 door from time to time, approximately 2,000 per door.</p> <p>15 Q. And you also talked about you still</p> <p>16 observed some protruding objects during today's visit</p> <p>17 to the store; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Is that a problem that you had also</p> <p>20 observed during the Rule 34 inspection last August?</p> <p>21 A. Yes.</p> <p>22 Q. What would it cost to remedy that problem?</p> <p>23 A. Nominal. It's just a matter of either</p> <p>24 placing something underneath it so they would have cane</p> <p>25 detection, or maybe closing the umbrella. If it wasn't</p>

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<p>1 an umbrella, if it was something else, if you just put 2 an object below it, below that 27 inches, it would 3 provide enough cane detection so that people wouldn't 4 run into it. And not only for blind people, but for 5 people that maybe are texting on their phone, they 6 wouldn't run into it. So it -- so it could be a safety 7 feature too.</p> <p>8 Q. And the fifth existing violation that you 9 testified to was the trash can is still obstructing the 10 door in the men's bathroom; is that right?</p> <p>11 A. Yes.</p> <p>12 Q. And is that similar to what you saw back 13 last August?</p> <p>14 A. Yes.</p> <p>15 Q. And is that a failure-to-maintain type of 16 problem?</p> <p>17 A. Yes.</p> <p>18 Q. How much would it cost to remediate that 19 problem?</p> <p>20 A. Again, nominal. They would have to create 21 -- create a policy, teach the employees and whoever 22 maintains the restrooms, so it should be nominal.</p> <p>23 Q. And based on your experience, what would 24 you estimate the cost of the remodeling, renovations 25 that you have observed that have taken place at the</p>	<p>185</p> <p>1 areas of noncompliance that you've identified as of 2 today would be readily achievable for an enterprise 3 with the financial resources to have made the 4 renovations that you've already witnessed?</p> <p>5 MR. PURYEAR: Objection.</p> <p>6 A. Based on what I've already seen, the 7 renovations that have been made from time to time, the 8 remaining issues are very, very small, maybe less than 9 -- maybe less than \$7,500. I have not seen their 10 financials, but it seems to be -- based on historical 11 of what they've done so far, I would assume that they 12 would be able to financially afford to make this 13 particular store 100 percent compliant.</p> <p>14 Q. And if you were able to review their 15 financials, could you provide a more detailed opinion 16 as to their financial wherewithal to perform the 17 remaining remediations?</p> <p>18 A. Probably a store with a parent their -- 19 that size, probably -- yeah, definitely -- you know, 20 definitely upon looking at cash flow, upon looking at 21 the financials, yes, would be able to make that 22 determination.</p> <p>23 Q. And do you have education and experience 24 in the financial industry?</p> <p>25 A. I have experience in the financial</p>
<p>186</p> <p>1 Roses store to be?</p> <p>2 MR. PURYEAR: Objection.</p> <p>3 A. You mean to date, since the initial 4 report?</p> <p>5 Q. Yes, sir.</p> <p>6 A. I would probably say somewhere around 7 15,000, approximately.</p> <p>8 Q. Would you characterize the renovations 9 that have taken place as significant?</p> <p>10 A. Yes.</p> <p>11 MR. PURYEAR: Objection.</p> <p>12 A. Yes.</p> <p>13 Q. And would you characterize the renovations 14 that have taken place to date as more than nominal in 15 cost?</p> <p>16 MR. PURYEAR: Objection.</p> <p>17 A. Yes. There -- what has been altered is 18 definitely more than nominal in cost.</p> <p>19 Q. And for a defendant that can afford those 20 type of already accomplished renovations, is it your 21 opinion that the remaining remediation would be readily 22 achievable?</p> <p>23 A. Yes.</p> <p>24 MR. PURYEAR: Objection.</p> <p>25 Q. Is it your opinion that the five remaining</p>	<p>188</p> <p>1 industry.</p> <p>2 Q. Are you able to read balance sheets?</p> <p>3 A. Yes.</p> <p>4 Q. Are you able to read P and L statements?</p> <p>5 A. Yes.</p> <p>6 Q. Those are all my questions for now. Thank 7 you.</p> <p>8 MR. PURYEAR: I have a few 9 follow-ups.</p> <p>10 <u>REDIRECT EXAMINATION BY MR. PURYEAR:</u></p> <p>11 Q. Mr. Childers, when you say that the 12 remaining fix-it would cost \$7,500, what do you base 13 that on?</p> <p>14 A. I'm basing it -- since I didn't bring any 15 materials here with me, I'm guesstimating that the two 16 door openers, that would be about 2,000 each. And 17 depending upon -- if you do have to purchase maybe 18 tiered or a different type of clothing to create that 19 36-inch space, that may -- that may be the majority of 20 the balance. The door opener -- you know, the stall 21 door opener and closer on both stalls, you're looking 22 at about a hundred dollars there, maybe.</p> <p>23 Q. Anything else?</p> <p>24 A. Let's see. Protruding objects, nominal, 25 so it shouldn't be any cost to that. It's just a</p>

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<p>189</p> <p>1 matter of rearranging a few things. And creating a</p> <p>2 policy to maintain the accessible features should be</p> <p>3 nominal also. It just has to be upkept.</p> <p>4 Q. Okay.</p> <p>5 A. That should be it.</p> <p>6 Q. All right. So we've got \$2,000 for the</p> <p>7 door openers. Excuse me.</p> <p>8 A. Each.</p> <p>9 Q. For the automatic doors, --</p> <p>10 A. Correct.</p> <p>11 Q. -- right? A hundred dollars for the door</p> <p>12 opener on the stall, nominal costs for protruding</p> <p>13 objects and creating a policy, and then the rest you</p> <p>14 guesstimate maybe would be made up by this buying new</p> <p>15 racks; is that right?</p> <p>16 A. If required. I'm not sure it's required.</p> <p>17 Q. So the two openers is 2,000. The door</p> <p>18 opener -- that's 2,100, so that means the remainder of</p> <p>19 your 7,500 is --</p> <p>20 A. Whoa. Whoa. Whoa. Wait. Wait. Wait.</p> <p>21 Two-thousand per --</p> <p>22 Q. So you --</p> <p>23 A. Wait. Wait. Two-thousand per door.</p> <p>24 Q. Oh, per door, okay. All right.</p> <p>25 A. Okay. So you're at 4--.</p>	<p>191</p> <p>1 A. Yes.</p> <p>2 Q. And you just testified that you had been</p> <p>3 in three to five other Roses. Can you name the other</p> <p>4 Roses you've been in besides the ones --</p> <p>5 A. That's what --</p> <p>6 Q. Let me finish. Have you been in Roses --</p> <p>7 can you name the Roses you've been in other than the</p> <p>8 one located at the Village Shopping Center and the one</p> <p>9 at Westwood?</p> <p>10 A. To the best of my memory, I can remember</p> <p>11 the Roses at Bordeaux Shopping Center.</p> <p>12 Q. Is that the same as the one on Westwood?</p> <p>13 A. No.</p> <p>14 Q. All right. So we've got the one on</p> <p>15 Westwood. We've got the one on Bordeaux, and we've got</p> <p>16 the one at Village; is that correct?</p> <p>17 A. That's correct.</p> <p>18 Q. All right. Is the one at Westwood still</p> <p>19 open? Do you know?</p> <p>20 A. I don't know.</p> <p>21 Q. When was the last time you were there?</p> <p>22 A. I don't remember, but it's been awhile.</p> <p>23 Q. What about the one on Bordeaux? Is the</p> <p>24 one on Bordeaux still open?</p> <p>25 A. It's not open.</p>
<p>190</p> <p>1 Q. All right. And then you add the 100 for</p> <p>2 the total for the stalls, --</p> <p>3 A. Right.</p> <p>4 Q. -- so that leaves \$3,400 for buying tiered</p> <p>5 or new racks?</p> <p>6 A. Yes.</p> <p>7 Q. And what you just said is you're just</p> <p>8 totally guessing as to that number; is that right?</p> <p>9 MR. LANE: Objection.</p> <p>10 A. It is an approximate number.</p> <p>11 Q. It is an approximate number. And what did</p> <p>12 you use to form the basis of your opinion that solving</p> <p>13 the dilemma in the women's clothing department would</p> <p>14 cost \$3,400?</p> <p>15 A. It was an approximation.</p> <p>16 Q. Okay.</p> <p>17 A. Again, there may not be -- it may be</p> <p>18 substantially less. There may be no additional monies</p> <p>19 required and maybe just a matter of relocating the</p> <p>20 existing racks.</p> <p>21 Q. Okay. So it's just an approximate number?</p> <p>22 A. It's an approximate number.</p> <p>23 Q. Okay. When we started this deposition, I</p> <p>24 asked if you had inspected any other Roses, and you</p> <p>25 said you had inspected the one at Westwood, right?</p>	<p>192</p> <p>1 Q. It's not open, okay. And we know the one</p> <p>2 at Village is open at least as of 11 o'clock this</p> <p>3 morning?</p> <p>4 A. At least as of.</p> <p>5 Q. All right. All right. Can you remember</p> <p>6 any other Roses you've been to, other than the ones at</p> <p>7 Westwood, Bordeaux and Village Shopping Center?</p> <p>8 A. Not at this time.</p> <p>9 Q. Okay. Can you remember being inside any</p> <p>10 other store owned or operated by Variety Stores other</p> <p>11 than the three you just named?</p> <p>12 A. No, I can't remember any.</p> <p>13 Q. If Roses had a thousand stores, and you've</p> <p>14 been in three of them, would you be able to say that</p> <p>15 Roses had a chronic problem related to design of its</p> <p>16 women's department in all of its stores?</p> <p>17 MR. LANE: Objection.</p> <p>18 A. Not based on three, no.</p> <p>19 Q. All right. Would you be able to say it's</p> <p>20 a systemic problem?</p> <p>21 A. I would be able to say when I'm in three</p> <p>22 of them and 100 percent of the three, all three were</p> <p>23 noncompliant, I mean, not a little, but major</p> <p>24 noncompliance issues like that existed in this</p> <p>25 particular case, when you see that 100 percent of the</p>

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<p>1 time, you can guesstimate and extrapolate that there's 2 probably a substantial number because -- of other 3 stores that are noncompliant. 4 Q. Have you had any training or classes in 5 statistics? 6 A. I have not. 7 Q. Okay. All right. So what you just said 8 was by looking at three stores, you would be able to 9 extrapolate a pattern that you would be comfortable 10 applying to a thousand stores; is that your statement? 11 MR. LANE: Objection. 12 A. I said you could. I didn't say -- I said 13 that based on the fact that if you go to three and 14 they're 100 percent, and it's just logical for me that 15 statistics -- you know, talking statistics, that if you 16 go to three and 100 percent of the three, it seems 17 logical to me that if you've got a thousand stores, 18 that there's going to be a substantial amount of stores 19 that are noncompliant. 20 Q. Okay. 21 A. That somehow these three were the only 22 three, okay, that were noncompliant and all the ones 23 were compliant seems to me highly unlogical. [sic] 24 Q. And that's based on what? 25 A. It's based on logic.</p>	193	<p>1 THE WITNESS: It has been a long 2 day. 3 (DEPOSITION TESTIMONY CONCLUDED AT 3:32 P.M.) 4 (REVIEW AND SIGNATURE RESERVED) 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	195
<p>1 Q. Logic, okay. Not based on statistics, 2 just based on -- 3 A. But also -- 4 Q. -- logic; is that right? 5 A. Primarily on logic. 6 MR. PURYEAR: I have no further 7 questions. 8 <u>RE-CROSS EXAMINATION BY MR. LANE:</u> 9 Q. Mr. Childers, have you ever been to a 10 Maxway store off of Yadkin Road in Fayetteville, North 11 Carolina? 12 A. I don't -- I don't remember. 13 Q. Have you seen the same or similar problems 14 in a hundred percent of any Variety store that you've 15 ever been in? 16 MR. PURYEAR: Objection. 17 A. Of the three that I recall being in, or 18 the three that I've written reports for, they all had 19 the same problems. 20 Q. Those are all my questions. Thank you. 21 MR. PURYEAR: Thank you for your 22 time, Mr. Richardson. [sic] 23 THE WITNESS: Childers. 24 MR. PURYEAR: Sorry. It's been 25 a long day.</p>	194	<p>1 NORTH CAROLINA 2 JOHNSTON COUNTY 3 I, Tammy Johnson, CVR-CM-M, a Notary Public 4 in and for Johnston County, North Carolina, do hereby 5 certify that Charles Childers appeared before me on 6 January 31st, 2014 and was duly sworn or affirmed prior 7 to giving testimony in this proceeding; that he was 8 subsequently examined, and that the deponent was 9 required to review the deposition transcript; and that 10 to the best of my knowledge, the foregoing pages 1-195 11 constitute a true and complete transcript of said 12 examination. 13 I further certify that I am not attorney nor 14 counsel for, nor related to or employed by any of the 15 parties to the action in which this deposition was 16 taken, and further, that I am not a relative or 17 employee of any attorney or counsel employed by the 18 parties hereto, nor interested, directly or indirectly, 19 in the matters of controversy, nor financially 20 interested in the result of this action. 21 In witness whereof, I have hereunto set my 22 hand and seal on this, the 13th day of February, 2014. 23 24 25</p>	196

Tammy Johnson, CVR-CM-M
Certified Verbatim Reporter
Notary Commission #20011560080

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF NORTH CAROLINA 3 WESTERN DIVISION</p> <p>4 RONALD RICHARDSON, Individually, 5 6 Plaintiff, 7 8 v. 9 10 VARIETY STORES, INC., a Foreign 11 Corporation, 12 13 Defendant.</p> <p>14 I, Charles Childers, hereby certify that I 15 was first duly sworn prior to the commencement of my 16 deposition, which was given before Tammy Johnson, 17 CVR-CM-M, in Fayetteville, North Carolina on January 18 31, 2014, and that review, examination, and signing of 19 the transcript was not waived. 20 I further certify that the foregoing pages 1 21 through 195 constitute a true and accurate transcript 22 of said deposition: 23 (A) _____ and no changes are necessary. 24 (B) _____ however, I desire the changes 25 attached here to be incorporated into said transcript. Witness my hand and seal on this, the _____ day of _____, _____. _____ Charles Childers State of _____ County of _____ Sworn to and subscribed before me on this, the _____ day of _____, _____. My Commission Expires: _____ _____ NOTARY PUBLIC</p>	197																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
<p>1 ERRATA SHEET 2 DEPOSITION OF CHARLES CHILDERS 3 TAKEN ON JANUARY 31, 2014</p> <table border="1"><thead><tr><th>4 PAGE #</th><th>5 LINE #</th><th>6 CURRENT CHANGE</th><th>7 REASON FOR CHANGE</th></tr></thead><tbody><tr><td>8</td><td>9</td><td>10</td><td>11</td></tr><tr><td>12</td><td>13</td><td>14</td><td>15</td></tr><tr><td>16</td><td>17</td><td>18</td><td>19</td></tr><tr><td>20</td><td>21</td><td>22</td><td>23</td></tr><tr><td>24</td><td>25</td><td>26</td><td>27</td></tr><tr><td>28</td><td>29</td><td>30</td><td>31</td></tr><tr><td>32</td><td>33</td><td>34</td><td>35</td></tr><tr><td>36</td><td>37</td><td>38</td><td>39</td></tr><tr><td>40</td><td>41</td><td>42</td><td>43</td></tr><tr><td>44</td><td>45</td><td>46</td><td>47</td></tr><tr><td>48</td><td>49</td><td>50</td><td>51</td></tr><tr><td>52</td><td>53</td><td>54</td><td>55</td></tr><tr><td>56</td><td>57</td><td>58</td><td>59</td></tr><tr><td>60</td><td>61</td><td>62</td><td>63</td></tr><tr><td>64</td><td>65</td><td>66</td><td>67</td></tr><tr><td>68</td><td>69</td><td>70</td><td>71</td></tr><tr><td>72</td><td>73</td><td>74</td><td>75</td></tr><tr><td>76</td><td>77</td><td>78</td><td>79</td></tr><tr><td>80</td><td>81</td><td>82</td><td>83</td></tr><tr><td>84</td><td>85</td><td>86</td><td>87</td></tr><tr><td>88</td><td>89</td><td>90</td><td>91</td></tr><tr><td>92</td><td>93</td><td>94</td><td>95</td></tr><tr><td>96</td><td>97</td><td>98</td><td>99</td></tr><tr><td>100</td><td>101</td><td>102</td><td>103</td></tr><tr><td>104</td><td>105</td><td>106</td><td>107</td></tr><tr><td>108</td><td>109</td><td>110</td><td>111</td></tr><tr><td>112</td><td>113</td><td>114</td><td>115</td></tr><tr><td>116</td><td>117</td><td>118</td><td>119</td></tr><tr><td>120</td><td>121</td><td>122</td><td>123</td></tr><tr><td>124</td><td>125</td><td>126</td><td>127</td></tr><tr><td>128</td><td>129</td><td>130</td><td>131</td></tr><tr><td>132</td><td>133</td><td>134</td><td>135</td></tr><tr><td>136</td><td>137</td><td>138</td><td>139</td></tr><tr><td>140</td><td>141</td><td>142</td><td>143</td></tr><tr><td>144</td><td>145</td><td>146</td><td>147</td></tr><tr><td>148</td><td>149</td><td>150</td><td>151</td></tr><tr><td>152</td><td>153</td><td>154</td><td>155</td></tr><tr><td>156</td><td>157</td><td>158</td><td>159</td></tr><tr><td>160</td><td>161</td><td>162</td><td>163</td></tr><tr><td>164</td><td>165</td><td>166</td><td>167</td></tr><tr><td>168</td><td>169</td><td>170</td><td>171</td></tr><tr><td>172</td><td>173</td><td>174</td><td>175</td></tr><tr><td>176</td><td>177</td><td>178</td><td>179</td></tr><tr><td>180</td><td>181</td><td>182</td><td>183</td></tr><tr><td>184</td><td>185</td><td>186</td><td>187</td></tr><tr><td>188</td><td>189</td><td>190</td><td>191</td></tr><tr><td>192</td><td>193</td><td>194</td><td>195</td></tr><tr><td>196</td><td>197</td><td>198</td><td>199</td></tr><tr><td>200</td><td>201</td><td>202</td><td>203</td></tr><tr><td>204</td><td>205</td><td>206</td><td>207</td></tr><tr><td>208</td><td>209</td><td>210</td><td>211</td></tr><tr><td>212</td><td>213</td><td>214</td><td>215</td></tr><tr><td>216</td><td>217</td><td>218</td><td>219</td></tr><tr><td>220</td><td>221</td><td>222</td><td>223</td></tr><tr><td>224</td><td>225</td><td>226</td><td>227</td></tr><tr><td>228</td><td>229</td><td>230</td><td>231</td></tr><tr><td>232</td><td>233</td><td>234</td><td>235</td></tr><tr><td>236</td><td>237</td><td>238</td><td>239</td></tr><tr><td>240</td><td>241</td><td>242</td><td>243</td></tr><tr><td>244</td><td>245</td><td>246</td><td>247</td></tr><tr><td>248</td><td>249</td><td>250</td><td>251</td></tr><tr><td>252</td><td>253</td><td>254</td><td>255</td></tr><tr><td>256</td><td>257</td><td>258</td><td>259</td></tr><tr><td>260</td><td>261</td><td>262</td><td>263</td></tr><tr><td>264</td><td>265</td><td>266</td><td>267</td></tr><tr><td>268</td><td>269</td><td>270</td><td>271</td></tr><tr><td>272</td><td>273</td><td>274</td><td>275</td></tr><tr><td>276</td><td>277</td><td>278</td><td>279</td></tr><tr><td>280</td><td>281</td><td>282</td><td>283</td></tr><tr><td>284</td><td>285</td><td>286</td><td>287</td></tr><tr><td>288</td><td>289</td><td>290</td><td>291</td></tr><tr><td>292</td><td>293</td><td>294</td><td>295</td></tr><tr><td>296</td><td>297</td><td>298</td><td>299</td></tr><tr><td>300</td><td>301</td><td>302</td><td>303</td></tr><tr><td>304</td><td>305</td><td>306</td><td>307</td></tr><tr><td>308</td><td>309</td><td>310</td><td>311</td></tr><tr><td>312</td><td>313</td><td>314</td><td>315</td></tr><tr><td>316</td><td>317</td><td>318</td><td>319</td></tr><tr><td>320</td><td>321</td><td>322</td><td>323</td></tr><tr><td>324</td><td>325</td><td>326</td><td>327</td></tr><tr><td>328</td><td>329</td><td>330</td><td>331</td></tr><tr><td>332</td><td>333</td><td>334</td><td>335</td></tr><tr><td>336</td><td>337</td><td>338</td><td>339</td></tr><tr><td>340</td><td>341</td><td>342</td><td>343</td></tr><tr><td>344</td><td>345</td><td>346</td><td>347</td></tr><tr><td>348</td><td>349</td><td>350</td><td>351</td></tr><tr><td>352</td><td>353</td><td>354</td><td>355</td></tr><tr><td>356</td><td>357</td><td>358</td><td>359</td></tr><tr><td>360</td><td>361</td><td>362</td><td>363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